

**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT**
Nuevo Energy Company Heavy Oil Western, CA

**FINAL ENGINEERING EVALUATION
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TITLE V APPLICATION REVIEW

Project #: 961000
Deemed Complete: September 15, 1997

Engineer: Carlos V. Garcia
Date: June 17, 2002

Facility Number: S-1372
Facility Name: Nuevo Energy Company
Mailing Address: 1200 Discovery Dr. Suite 500
Bakersfield, CA 93309-7007

Contact Name: Rick Garcia
Phone: (661) 395-5426

Responsible Official: Rick Garcia
Title: ESRC Manager

I. PROPOSAL

Nuevo Energy Company is proposing that an initial Title V permit be issued for its Western Heavy Oil Source facility in Kern County. The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

II. FACILITY LOCATION

The Western Heavy Oilfields facility is located in Kern County, California.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is shown in Attachment A.

A summary of the exempt equipment categories which describe the insignificant activities or equipment at the facility not requiring a permit is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to use the following model general permit templates:

A. SJV-UM-0-1 Facility-Wide Umbrella General Permit Template

The applicant has requested to utilize template SJV-UM-0-1, Umbrella General Permit Template, for the entire facility. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

Rules 8021, 8031, 8051, 8061, and 8071 have recently been approved into the SIP. Based on comments by EPA, the template conditions have been adjusted to reflect the new requirements. Also based on EPA comments, Rule 1081 was adjusted to reflect that the District is able to

B. SJV-GT-7-0 Series Gas Turbines

The applicant has requested to utilize template SJV-GT-7-0 for the following three gas turbines: S-1372-187-7, 188-6, and 194-8. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the usage of this template.

C. SJV-BSG-13-0 Series 13 Boilers and Steam Generators

The applicant has requested to utilize template SJV-BSG-13-0 for the following fifteen steam generators in the application: S-1372-8-16, 10-17, 13-18, 14-17, 16-19, 17-20, 18-20, 19-19, 20-19, 24-18, 29-17, 30-18, 32-16, 33-15, and 34-15.

Fuel oil references related to the template conditions were deleted from the requirements of the following permit units: S-1372-8-16, -10-17, 13-18, 14-17, 16-19, 24-18, 29-17, 30-18, 32-16, 33-15, and 34-15. These units are gas-fired and template fuel oil requirements were therefore not applicable.

Based on the information submitted in the Template Qualification Form, the applicant qualifies for the usage of this template.

D. SJV-BSG-17-0 Boilers and Steam Generators

The applicant has requested to utilize template SJV-BSG-17-0, for the following seven steam generators in the application: S-1372-141-1, 142-1, 143-1, 144-1, 145-2, 147-1, and 148-1. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the usage of this template.

Fuel oil references were deleted from the requirements for these permit units (S-1372-141-1, 142-1, 143-1, 144-1, 145-2, 147-1, and 148-1). These units are gas-fired and template fuel oil requirements were therefore not applicable.

E. SJV-BSG-19-0 Boilers and Steam Generators

The applicant has requested to utilize template SJV-BSG-19-0 for permit S-111-4 in the application. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the usage of this template.

Fuel oil references were deleted from the requirements for this permit unit (S-1372-111-04). These units are gas-fired and template fuel oil requirements were therefore not applicable.

V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA and Public review:

Permit Unit	Conditions
-0-1	1 through 30 and 36 through 41
-10-17, -16-19	20 through 35
-13-18, -14-17, & -34-15	21 through 36
-17-20	27 through 45
-18-20, -19-19, -20-19	23 through 41
-24-18	19 through 34
-33-15	24 through 39
-29-18	25 through 40
-30-18, -32-16	23 through 38
-141-1, 142-1, -143-1, -144-1, -145-2, -147-1 & -148-1	3 through 17

-111-5	18 through 47
-187-7, -188-6 & -194-8	1 through 25

The following units are currently dormant and have conditions to remove them from service, therefore no Title V evaluation for these units will be made. A condition has been added that requires the owner or operator to apply for a Title V modification before the unit is make operational.

Permit Unit	Description
-137-5	Steam Generator

VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES

District Rule 1100 - Equipment Breakdown¹ (Last Amended 12/17/92)

District Rule 1160 - Emission Statements¹ (Adopted 11/18/92)

District Rule 2010 - Permits Required¹ (Last Amended 12/17/92)

District Rule 2020 - Exemptions¹ (Last Amended 12/21/94)

District Rule 2031 - Transfer of Permits¹ (Last Amended 12/17/92)

District Rule 2040 - Applications¹ (Last Amended 12/17/92)

District Rule 2070 - Standards for Granting Applications¹ (Last Amended 12/17/92)

District Rule 2080 - Conditional Approval¹ (Last Amended 12/17/92)

District Rule 2520 - Federally Mandated Operating Permits, Sections 5.2, 9.5.1, 9.5.2, 9.6.1, 9.6.2, 9.8, 9.9.1, 9.9.2, 9.9.3, 9.9.4, 9.9.5, 9.10, 9.13.1, 9.14.1, 9.14.2, 9.17, and 10.0¹ (Adopted 06/15/95)

District Rule 4101 - Visible Emissions¹ (Last Amended 12/17/92)

District Rule 4201 – Particulate Matter Concentration, Section 3.1 (Last Amended 12/17/92)^{1, 2, 3, 4}

¹ The Umbrella General Permit Template addressed these requirements for all permit units at this facility. Rules 8021, 8031, 8051, 8061, and 8071 have recently been approved into the SIP. The template conditions have been adjusted to reflect the new requirements.

District Rule 4301 – Fuel Burning Equipment (Last Amended 12/17/92)

District Rule 4601 - Architectural Coatings¹ (Last Amended 12/17/92)

District Rule 8021, 8031, 8051, 8061, and 8071 - Fugitive Dust (PM₁₀) Emissions¹
(Last Amended 4/25/96)

40 CFR 60 – Subpart GG – Standards of Performance for Stationary Gas Turbines²

40 CFR Part 82 - Subpart F, Stratospheric Ozone⁵

40 CFR Part 61 - Subpart M, National Emission Standard for Asbestos¹

Kern County Rule 108.1 – Source Sampling^{6, 7, 8, 9}

District Rule 2520 – Federally Mandated Operating Permits, Sections 9.4.2 and
9.5.2 (Adopted 6/15/95)^{2, 3, 4, 5}

Kern County Rule 407 – Sulfur Compounds²

Kern County Rule 407.2 – Fuel Burning Equipment Combustion Contaminants^{2, 3, 4, 5}

Kern County Rule 424 – Sulfur Compounds From Oil Field Steam Generators³

40 CFR 60, Subpart Dc – Standards of Performance for Small Industrial-
Commercial-Institutional Steam Generating Units.⁵

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

District New and Modified Stationary Source Review Rule

¹ Model General Permit Template SJV-GT-7-0 addressed these requirements for permit units S-1372-187-7, 188-6, 194-8.

² Model General Permit Template SJV-BSG-13-0 addressed these requirements for permit units S-1372-8-16, 10-17, 13-18, 14-17, 16-19, 17-20, 18-20, 19-19, 20-19, 24-18, 29-17, 30-18, 32-16, 33-15, and 34-15.

³ Model General Permit Template SJV-BSG-17-0 addressed these requirements for permit units S-1372-141-1, 142-1, 143-1, 144-1, 145-2, 147-1, and 148-1.

⁴ Model General Permit Template SJV-BSG-19-0 addressed these requirements for permit unit S-111-04.

⁵ The Umbrella General Permit Template addressed these requirements for all permit units at this facility.

⁶ Model General Permit Template SJV-GT-7-0 addressed these requirements for permit units S-1372-187-7, 188-6, 194-8.

⁷ Model General Permit Template SJV-BSG-13-0 addressed these requirements for permit units S-1372-8-16, 10-17, 13-18, 14-17, 16-19, 17-20, 18-20, 19-19, 20-19, 24-18, 29-17, 30-18, 32-16, 33-15, and 34-15.

⁸ Model General Permit Template SJV-BSG-17-0 addressed these requirements for permit units S-1372-141-1, 142-1, 143-1, 144-1, 145-2, 147-1, and 148-1.

⁹ Model General Permit Template SJV-BSG-19-0 addressed these requirements for permit unit S-111-04.

District Rule 1081 – Source Sampling (Last Amended 12/17/92)(Non-SIP replacement for Kern County Rule 108.1)

District Rule 2520 – Federally Mandated Operating Permits, Section 9.4.2 (Adopted 6/15/95)

District Rule 4201 – Particulate Matter Concentration (Last Amended 12/17/92)

Kern County Rule 424 – Sulfur Compounds From Oil Field Steam Generators

District Rule 4301 – Fuel Burning Equipment (Last Amended 12/17/92)

District Rule 4401 – Steam-Enhanced Crude Oil Production Well Vents (Last Amended 1/15/98)

District Rule 4402 – Crude Oil Production Sumps (Last Amended 12/17/92)

District Rule 4621 – Gasoline Transfer Into Stationary Storage Containers, Delivery Vessels, and Bulk Plants (Last Amended 6/18/98)

District Rule 4622 – Gasoline Transfer Into Motor Vehicle Fuel Tanks (Last Amended 6/18/98)

District Rule 4623 – Storage of Organic Liquids (Last Amended 12/17/92)

District Rule 4801 – Sulfur Compounds (Last Amended 12/17/92) (Non-SIP replacement for Kern County Rule 407)

40 CFR 60, Subparts K, Ka, and Kb – Standards of Performance for Storage Vessels for Petroleum Liquids

40 CFR 63, Subpart HH National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities

40 CFR Part 68 Chemical Accident Prevention Provisions

VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as Federally Enforceable Through Title V Permit.

This facility is subject to the following rules that are not currently federally enforceable:

- District Rule 4102 Nuisance (Amended December 17, 1992)

For this facility the following conditions are based on the rules listed above and are not Federally Enforceable through Title V:

Permit Unit	Condition	District Rule
-0-1	42	4102

IX. COMPLIANCE

A. Requirements Addressed by Model General Permit Templates

1. Facility Wide Requirements

The applicant is proposing to use a general permit template to address federally applicable facility-wide requirements. Section IV of template SJV-UM-0-1 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the facility wide requirements S-1372-0-1 as condition numbers 1 through 41 to assure compliance with these requirements. Rules 8021, 8031, 8051, 8061, and 8071 have recently been approved into the SIP. These rules have been adjusted to reflect the new requirements.

2. Cogeneration Turbines (S-1372-187-7, 188-6, and 194-8)

The applicant is proposing to use a general permit template to address federally applicable requirements for the turbines. Section IV of template SJV-GT-7-0 includes a demonstration of compliance for applicable requirements. Template conditions have been added to the requirements for permit units S-1372-187-7, 188-6, and 194-8 as condition numbers 1 through 25 to assure compliance with these requirements.

3. Steam Generators (S-1372-8-16, 10-17, 13-18, 14-17, 16-19, 17-20, 18-20, 19-19, 20-19, 24-18, 29-17, 30-18, 32-16, 33-15, and 34-15)

The applicant is proposing to use general permit templates to address federally applicable requirements for the Steam Generators. Section IV of template SJV-BSG-13-0 includes a demonstration of compliance for applicable requirements. The following template conditions have

been added to the requirements for the permit units to assure compliance with these requirements.

Permit Unit	Conditions
-10-17, -16-19	20 through 35
-13-18, -14-17, & -34-15	21 through 36
-17-20	27 through 45
-18-20, -19-19, -20-19	23 through 41
-24-18	19 through 34
-29-18	25 through 40
-8-16, -33-15	24 through 39
-30-18, -32-16	23 through 38

4. Heater Treaters (S-1372-141-1, 142-2, 143-1, 144-1, 145-2, 147-1, 148-1)

The applicant is proposing to use general permit templates to address federally applicable requirements for the Steam Generators. Section IV of template SJV-BSG-17-0 includes a demonstration of compliance for applicable requirements. The following template conditions have been added to the requirements for the permit units to assure compliance with these requirements.

Permit Unit	Conditions
-141-1, 142-1, -143-1, -144-1, -145-2, -147-1 & -148-1	3 through 17

5. Steam Generator (S-1372-111-5)

The applicant is proposing to use general permit templates to address federally applicable requirements for the Steam Generators. Section IV of template SJV-BSG-19-0 includes a demonstration of compliance for applicable requirements. Template conditions have been added to the requirements for permit unit S-1372-111-5 as condition numbers 18 through 47 to assure compliance with these requirements.

B. Requirements Not Addressed by Model General Permit Templates

1. New and Modified Stationary Source Review Rule (District NSR Rule)
- a. Steam Generator (S-1372-1-18)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development

of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 1 of the requirements for this permit unit.
- Condition 2 from the PTO identifies the approved operating locations and was included as condition 2 of the requirements for permit unit (S-1372-1-18)
- Condition 3 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-1-18)
- Condition 4 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-1-18)
- Condition 5 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-1-18)
- Condition 6 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-1-18)
- Condition 7 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-1-18)
- Condition 8 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-1-18)
- Condition 9 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-1-18)
- Condition 10 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-1-18)
- Condition 11 from the PTO was included as condition 11 of the requirements for permit unit (S-1372-1-18)
- Condition 12 from the PTO was included as condition 12 of the requirements for permit unit (S-1372-1-18)
- Condition 13 from the PTO was included as condition 13 of the requirements for permit unit (S-1372-1-18)
- Condition 14 from the PTO was included as condition 14 of the requirements for permit unit (S-1372-1-18)
- Condition 15 from the PTO was included as condition 15 of the requirements for permit unit (S-1372-1-18)
- Condition 16 from the PTO was included as condition 16 of the requirements for permit unit (S-1372-1-18))
- Condition 17 from the PTO was included as condition 17 of the requirements for permit unit (S-1372-1-18)
- Condition 18 from the PTO was included as condition 18 of the requirements for permit unit (S-1372-1-18)
- Condition 19 from the PTO was included as condition 19 of the requirements for permit unit (S-1372-1-18)

- Condition 20 from the PTO was included as condition 20 of the requirements for permit unit (S-1372-1-18)
- Condition 21 from the PTO was included as condition 21 of the requirements for permit unit (S-1372-1-18)
- Condition 22 from the PTO was included as condition 22 of the requirements for permit unit (S-1372-1-18)
- Condition 23 from the PTO was included as condition 23 of the requirements for permit unit (S-1372-1-18)

b. Steam Generator (S-1372-2-13)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 22 of the facility wide requirements (S-1372-0-1). Condition 22 of the facility wide requirements specifies a limit of 20% opacity for no more than three minutes in any one-hour period.
- Condition 2 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-2-13)
- Condition 3 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-2-13)
- Condition 4 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-2-13)
- Condition 5 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-2-13)
- Condition 6 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-2-13)
- Condition 7 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-2-13)
- Condition 8 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-2-13)
- Condition 9 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-2-13)
- Condition 10 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-2-13)
- Condition 11 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-2-13)
- Condition 12 from the PTO was included as condition 11 of the requirements for permit unit (S-1372-2-13)

- Condition 13 from the PTO was included as condition 12 of the requirements for permit unit (S-1372-2-13)
- Condition 14 from the PTO was included as condition 13 of the requirements for permit unit (S-1372-2-13)
- Condition 15 from the PTO was included as condition 14 of the requirements for permit unit (S-1372-2-13)
- Condition 16 from the PTO was included as condition 15 of the requirements for permit unit (S-1372-2-13)
- Condition 17 from the PTO was included as condition 16 of the requirements for permit unit (S-1372-2-13)
- Condition 18 from the PTO was included as condition 17 of the requirements for permit unit (S-1372-2-13)
- Condition 19 from the PTO was included as condition 18 of the requirements for permit unit (S-1372-2-13)
- Condition 20 from the PTO was included as condition 19 of the requirements for permit unit (S-1372-2-13)
- Condition 21 from the PTO was included as condition 20 of the requirements for permit unit (S-1372-2-13)
- Condition 22 from the PTO was included as condition 21 of the requirements for permit unit (S-1372-2-13)
- Condition 23 from the PTO was included as condition 22 of the requirements for permit unit (S-1372-2-13)

c. Steam Generator (S-1372-4-10)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 22 of the facility wide requirements (S-1372-0-1). Condition 22 of the facility wide requirements specifies a limit of 20% opacity for no more than three minutes in any one-hour period.
- Condition 2 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-4-10)
- Condition 3 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-4-10)
- Condition 4 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-4-10)
- Condition 5 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-4-10)

- Condition 6 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-4-10)
- Condition 7 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-4-10)
- Condition 8 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-4-10)
- Condition 9 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-4-10)
- Condition 10 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-4-10)
- Condition 11 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-4-10)
- Condition 12 from the PTO was included as condition 11 of the requirements for permit unit (S-1372-4-10)
- Condition 13 from the PTO was included as condition 12 of the requirements for permit unit (S-1372-4-10)
- Condition 14 from the PTO was included as condition 13 of the requirements for permit unit (S-1372-4-10)
- Condition 15 from the PTO was included as condition 14 of the requirements for permit unit (S-1372-4-10)
- Condition 16 from the PTO was included as condition 15 of the requirements for permit unit (S-1372-4-10)
- Condition 17 from the PTO was included as condition 16 of the requirements for permit unit (S-1372-4-10)
- Condition 18 from the PTO was included as condition 17 of the requirements for permit unit (S-1372-4-10)
- Condition 19 from the PTO was included as condition 18 of the requirements for permit unit (S-1372-4-10)
- Condition 20 from the PTO was included as condition 19 the requirements for permit unit (S-1372-4-10)
- Condition 21 from the PTO was included as condition 20 of the requirements for permit unit (S-1372-4-10)
- Condition 22 from the PTO was included as condition 21 of the requirements for permit unit (S-1372-4-10)
- Condition 23 from the PTO was included as condition 22 of the requirements for permit unit (S-1372-4-10)
- Condition 24 from the PTO was included as condition 23 of the requirements for permit unit (S-1372-4-10)

d. Steam Generators (S-1372-8-16)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development

of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 1 of the facility wide requirements (S-1372-0-1).
- Condition 2 from the PTO was included as condition 2 of the requirements for this permit unit.
- Condition 3 from the PTO was included as condition 22 of the facility wide requirements (S-1372-0-1).
- Condition 4 from the PTO was included in condition 3 of the requirements for this permit unit.
- Condition 5 from the PTO was included as condition 4 of the requirements for this permit unit.
- Condition 6 from the PTO was included as condition 5 of the requirements for this permit unit.
- Condition 7 from the PTO was included as condition 6 of the requirements for this permit unit.
- Condition 8 from the PTO was included as condition 7 of the requirements for this permit unit.
- Condition 9 from the PTO was included as condition 8 of the requirements for this permit unit.
- Condition 10 from the PTO was included as condition 9 of the requirements for this permit unit.
- Conditions 11 through 22 from the PTO were included as conditions 10 through 21 of the requirements for this permit unit.
- Condition 23 from the PTO was included as condition 26 of the requirements for this permit unit.

e. Steam Generators (S-1372 –10-17)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 22 of the facility wide requirements (S-1372-0-1). Condition 22 of the facility wide requirements specifies a limit of 20% opacity for no more than three minutes in any one-hour period.
- Condition 2 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-10-17)

- Condition 3 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-10-17)
- Condition 4 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-10-17)
- Condition 5 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-10-17)
- Condition 6 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-10-17)
- Condition 7 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-10-17)
- Condition 8 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-10-17)
- Condition 9 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-10-17)
- Condition 10 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-10-17)
- Condition 11 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-10-17)
- Condition 12 from the PTO was included as condition 11 of the requirements for permit unit (S-1372-10-17)
- Condition 13 from the PTO was included as condition 12 of the requirements for permit unit (S-1372-10-17)
- Condition 14 from the PTO was included as condition 13 of the requirements for permit unit (S-1372-10-17)
- Condition 15 from the PTO was included as condition 14 of the requirements for permit unit (S-1372-10-17)
- Condition 16 from the PTO was included as condition 15 of the requirements for permit unit (S-1372-10-17)
- Condition 17 from the PTO was included as condition 16 of the requirements for permit unit (S-1372-10-17)
- Condition 18 from the PTO was included as condition 17 of the requirements for permit unit (S-1372-10-17)
- Condition 19 from the PTO was included as condition 22 of the requirements for permit unit (S-1372-10-17)

f. Steam Generators (S-1372 –13-18)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 22 of the facility wide requirements (S-1372-0-1). Condition 22 of the facility wide requirements specifies a limit of 20% opacity for no more than three minutes in any one-hour period.
- Condition 2 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-13-18)
- Condition 3 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-13-18)
- Condition 4 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-13-18)
- Condition 5 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-13-18)
- Condition 6 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-13-18)
- Condition 7 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-13-18)
- Condition 8 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-13-18)
- Condition 9 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-13-18)
- Condition 10 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-13-18)
- Condition 11 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-13-18)
- Condition 12 from the PTO was included as condition 11 of the requirements for permit unit (S-1372-13-18)
- Condition 13 from the PTO was included as condition 12 of the requirements for permit unit (S-1372-13-18)
- Condition 14 from the PTO was included as condition 13 of the requirements for permit unit (S-1372-13-18)
- Condition 15 from the PTO was included as condition 14 of the requirements for permit unit (S-1372-13-18)
- Condition 16 from the PTO was included as condition 15 of the requirements for permit unit (S-1372-13-18)
- Condition 17 from the PTO was included as condition 16 of the requirements for permit unit (S-1372-13-18)
- Condition 18 from the PTO was included as condition 17 of the requirements for permit unit (S-1372-13-18)
- Condition 19 from the PTO was included as condition 18 of the requirements for permit unit (S-1372-13-18)
- Condition 20 from the PTO was included as condition 23 of the requirements for permit unit (S-1372-13-18)

g. Steam Generators (S-1372 –14-17)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 22 of the facility wide requirements (S-1372-0-1). Condition 22 of the facility wide requirements specifies a limit of 20% opacity for no more than three minutes in any one-hour period.
- Condition 2 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-14-17)
- Condition 3 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-14-17)
- Condition 4 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-14-17)
- Condition 5 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-14-17)
- Condition 6 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-14-17)
- Condition 7 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-14-17)
- Condition 8 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-14-17)
- Condition 9 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-14-17)
- Condition 10 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-14-17)
- Condition 11 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-14-17)
- Condition 12 from the PTO was included as condition 11 of the requirements for permit unit (S-1372-14-17)
- Condition 13 from the PTO was included as condition 12 of the requirements for permit unit (S-1372-14-17)
- Condition 14 from the PTO was included as condition 13 of the requirements for permit unit (S-1372-14-17)
- Condition 15 from the PTO was included as condition 14 of the requirements for permit unit (S-1372-14-17)
- Condition 16 from the PTO was included as condition 15 of the requirements for permit unit (S-1372-14-17)
- Condition 17 from the PTO was included as condition 16 of the requirements for permit unit (S-1372-14-17)

- Condition 18 from the PTO was included as condition 17 of the requirements for permit unit (S-1372-14-17)
- Condition 19 from the PTO was included as condition 18 of the requirements for permit unit (S-1372-14-17)
- Condition 20 from the PTO was included as condition 23 of the requirements for permit unit (S-1372-14-17)

h. Steam Generators (S-1372 –16-19)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 22 of the facility wide requirements (S-1372-0-1). Condition 22 of the facility wide requirements specifies a limit of 20% opacity for no more than three minutes in any one-hour period.
- Condition 2 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-16-19)
- Condition 3 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-16-19)
- Condition 4 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-16-19)
- Condition 5 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-16-19)
- Condition 6 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-16-19)
- Condition 7 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-16-19)
- Condition 8 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-16-19)
- Condition 9 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-16-19)
- Condition 10 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-16-19)
- Condition 11 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-16-19)
- Condition 12 from the PTO was included as condition 11 of the requirements for permit unit (S-1372-16-19)
- Condition 13 from the PTO was included as condition 12 of the requirements for permit unit (S-1372-16-19)

- Condition 14 from the PTO was included as condition 13 of the requirements for permit unit (S-1372-16-19)
- Condition 15 from the PTO was included as condition 14 of the requirements for permit unit (S-1372-16-19)
- Condition 16 from the PTO was included as condition 15 of the requirements for permit unit (S-1372-16-19)
- Condition 17 from the PTO was included as condition 16 of the requirements for permit unit (S-1372-16-19)
- Condition 18 from the PTO was included as condition 17 of the requirements for permit unit (S-1372-16-19)
- Condition 19 from the PTO was included as condition 18 of the requirements for permit unit (S-1372-16-19)
- Condition 20 from the PTO was included as condition 19 of the requirements for permit unit (S-1372-16-19)
- Condition 21 from the PTO was included as condition 20 of the requirements for permit unit (S-1372-16-19)
- Condition 22 from the PTO was included as condition 21 of the requirements for permit unit (S-1372-16-19)
- Condition 23 from the PTO was included as condition 22 of the requirements for permit unit (S-1372-16-19)
- Condition 24 from the PTO was included as condition 27 of the requirements for permit unit (S-1372-16-19)

i. Steam Generators (S-1372 –17-20)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-17-20)
- Condition 2 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-17-20)
- Condition 3 from the PTO was included in condition 22 of the facility wide requirements (S-1372-0-1). Condition 22 of the facility wide requirements specifies a limit of 20% opacity for no more than three minutes in any one-hour period.
- Condition 4 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-17-20)
- Condition 5 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-17-20)

- Condition 6 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-17-20)
- Condition 7 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-17-20)
- Condition 8 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-17-20)
- Condition 9 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-17-20)
- Condition 10 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-17-20)
- Condition 11 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-17-20)
- Condition 12 from the PTO was included in conditions 11 and 21 of the requirements for permit unit (S-1372-17-20)
- Condition 13 from the PTO was included as condition 12 of the requirements for permit unit (S-1372-17-20)
- Condition 14 from the PTO was included as condition 13 of the requirements for permit unit (S-1372-17-20)
- Condition 15 from the PTO was included as condition 14 of the requirements for permit unit (S-1372-17-20)
- Condition 16 from the PTO was included as condition 15 of the requirements for permit unit (S-1372-17-20)
- Condition 17 from the PTO was included as condition 16 of the requirements for permit unit (S-1372-17-20)
- Condition 18 from the PTO was included as condition 17 of the requirements for permit unit (S-1372-17-20)
- Condition 19 from the PTO was included as condition 18 of the requirements for permit unit (S-1372-17-20)
- Condition 20 from the PTO was included as condition 19 of the requirements for permit unit (S-1372-17-20)
- Condition 21 from the PTO was included as condition 20 of the requirements for permit unit (S-1372-17-20)
- Condition 22 from the PTO was included as condition 21 of the requirements for permit unit (S-1372-17-20)
- Condition 23 from the PTO was included as condition 22 of the requirements for permit unit (S-1372-17-20)
- Condition 24 from the PTO was included as condition 23 of the requirements for permit unit (S-1372-17-20)
- Condition 25 from the PTO was included as condition 24 of the requirements for permit unit (S-1372-17-20)
- Condition 26 from the PTO was included as condition 25 of the requirements for permit unit (S-1372-17-20)
- Condition 27 from the PTO was included as condition 26 of the requirements for permit unit (S-1372-17-20)

- Condition 28 from the PTO was included in condition 29 of the requirements for permit unit (S-1372-17-20)

j. Steam Generators (S-1372 –18, -19, -20)

These permit units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 22 of the facility wide requirements (S-1372-0-1). Condition 22 of the facility wide requirements specifies a limit of 20% opacity for no more than three minutes in any one-hour period.
- Condition 2 from the PTO was included as condition 1 of the requirements for these permit units.
- Condition 3 from the PTO was included as condition 2 of the requirements for these permit units.
- Condition 4 from the PTO was included as condition 3 of the requirements for these permit units.
- Condition 5 from the PTO was included in conditions 4 of the requirements for these permit units.
- Condition 6 from the PTO was included as condition 5 of the requirements for these permit units.
- Condition 7 from the PTO was included as condition 6 of the requirements for these permit units.
- Condition 8 from the PTO was included as condition 7 of the requirements for these permit units.
- Condition 9 from the PTO was included as condition 8 of the requirements for these permit units.
- Condition 10 from the PTO was included as condition 9 of the requirements for these permit units.
- Condition 11 from the PTO was included as condition 10 of the requirements for these permit units.
- Condition 12 from the PTO was included as condition 11 of the requirements for these permit units.
- Condition 13 from the PTO was included as condition 12 of the requirements for these permit units.
- Condition 14 from the PTO was included as condition 13 of the requirements for these permit units.
- Condition 15 from the PTO was included as condition 14 of the requirements for these permit units.

- Condition 16 from the PTO was included as condition 15 of the requirements for these permit units.
- Condition 17 from the PTO was included as condition 16 of the requirements for these permit units.
- Condition 18 from the PTO was included as condition 17 of the requirements for these permit units.
- Condition 19 from the PTO was included as condition 18 of the requirements for these permit units.
- Condition 20 from the PTO was included as condition 19 of the requirements for these permit units.
- Condition 21 from the PTO was included as condition 20 of the requirements for these permit units.
- Condition 22 from the PTO was included in condition 21 of the requirements for these permit units.
- Condition 23 from the PTO was included in condition 22 of the requirements for these permit units.
- Condition 24 from the PTO was included as condition 25 of the requirements for these permit units.

k. Steam Generator (S-1372-24-18)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 22 of the facility wide requirements (S-1372-0-1). Condition 22 of the facility wide requirements specifies a limit of 20% opacity for no more than three minutes in any one-hour period.
- Condition 2 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-24-18)
- Condition 3 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-24-18)
- Condition 4 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-24-18)
- Condition 5 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-24-18)
- Condition 6 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-24-18)
- Condition 7 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-24-18)

- Condition 8 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-24-18)
- Condition 9 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-24-18)
- Condition 10 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-24-18)
- Condition 11 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-24-18)
- Condition 12 from the PTO was included as condition 11 of the requirements for permit unit (S-1372-24-18)
- Condition 13 from the PTO was included as condition 12 of the requirements for permit unit (S-1372-24-18)
- Condition 14 from the PTO was included as condition 13 of the requirements for permit unit (S-1372-24-18)
- Condition 15 from the PTO was included as condition 14 of the requirements for permit unit (S-1372-24-18)
- Condition 16 from the PTO was included as condition 15 of the requirements for permit unit (S-1372-24-18)
- Condition 17 from the PTO was included as condition 16 of the requirements for permit unit (S-1372-24-18)
- Condition 18 from the PTO was included as condition 21 of the requirements for permit unit (S-1372-24-18)
- Condition 19 from the PTO was included as condition 22 of the requirements for permit unit (S-1372-24-18)

I. Steam Generator (S-1372 -26-8)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 22 of the facility wide requirements (S-1372-0-1). Condition 22 of the facility wide requirements specifies a limit of 20% opacity for no more than three minutes in any one-hour period.
- Condition 2 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-26-8)
- Condition 3 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-26-8)
- Condition 4 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-26-8)

- Condition 5 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-26-8)
- Condition 6 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-26-8)
- Condition 7 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-26-8)
- Condition 8 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-26-8)
- Condition 9 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-26-8)
- Condition 10 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-26-8)
- Condition 11 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-26-8)
- Condition 12 from the PTO was included as condition 11 of the requirements for permit unit (S-1372-26-8)
- Condition 13 from the PTO was included as condition 12 of the requirements for permit unit (S-1372-26-8)
- Condition 14 from the PTO was included as condition 13 of the requirements for permit unit (S-1372-26-8)
- Condition 15 from the PTO was included as condition 14 of the requirements for permit unit (S-1372-26-8)
- Condition 16 from the PTO was included as condition 15 of the requirements for permit unit (S-1372-26-8)
- Condition 17 from the PTO was included as condition 16 of the requirements for permit unit (S-1372-26-8)
- Condition 18 from the PTO was included as condition 17 of the requirements for permit unit (S-1372-26-8)
- Condition 19 from the PTO was included as condition 22 of the requirements for permit unit (S-1372-26-8)

m. Steam Generator (S-1372-29-17)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 22 of the facility wide requirements (S-1372-0-1). Condition 22 of the facility wide requirements specifies a limit of 20% opacity for no more than three minutes in any one-hour period.

- Condition 2 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-29-17)
- Condition 3 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-29-17)
- Condition 4 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-29-17)
- Condition 5 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-29-17)
- Condition 6 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-29-17)
- Condition 7 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-29-17)
- Condition 8 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-29-17)
- Condition 9 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-29-17)
- Condition 10 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-29-17)
- Condition 11 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-29-17)
- Condition 12 from the PTO was included as condition 11 of the requirements for permit unit (S-1372-29-17)
- Condition 13 from the PTO was included as condition 12 of the requirements for permit unit (S-1372-29-17)
- Condition 14 from the PTO was included as condition 13 of the requirements for permit unit (S-1372-29-17)
- Condition 15 from the PTO was included as condition 14 of the requirements for permit unit (S-1372-29-17)
- Condition 16 from the PTO was included as condition 15 of the requirements for permit unit (S-1372-29-17)
- Condition 17 from the PTO was included as condition 16 of the requirements for permit unit (S-1372-29-17)
- Condition 18 from the PTO was included as condition 17 of the requirements for permit unit (S-1372-29-17)
- Condition 19 from the PTO was included as condition 18 of the requirements for permit unit (S-1372-29-17)
- Condition 20 from the PTO was included as condition 19 of the requirements for permit unit (S-1372-29-17)
- Condition 21 from the PTO was included as condition 20 of the requirements for permit unit (S-1372-29-17)
- Condition 22 from the PTO was included as condition 21 of the requirements for permit unit (S-1372-29-17)
- Condition 23 from the PTO was included as condition 22 of the requirements for permit unit (S-1372-29-17)

n. Steam Generator (S-1372-30-18, 31-16, and –32-16)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 1 of the requirements for these permit units.
- Condition 2 from the PTO was included as condition 2 of the requirements for these permit units.
- Condition 3 from the PTO was included in condition 22 of the facility wide requirements (S-1372-0-1). Condition 22 of the facility wide requirements specifies a limit of 20% opacity for no more than three minutes in any one-hour period.
- Condition 4 from the PTO was included as condition 3 of the requirements for these permit units.
- Condition 5 from the PTO was included as condition 4 of the requirements for these permit units.
- Condition 6 from the PTO was included as condition 5 of the requirements for these permit units.
- Condition 7 from the PTO was included as condition 6 of the requirements for these permit units.
- Condition 8 from the PTO was included as condition 7 of the requirements for these permit units.
- Condition 9 from the PTO was included as condition 8 of the requirements for these permit units.
- Condition 10 from the PTO was included as condition 9 of the requirements for these permit units.
- Condition 11 from the PTO was included as condition 10 of the requirements for these permit units.
- Condition 12 from the PTO was included as condition 11 of the requirements for these permit units.
- Condition 13 from the PTO was included as condition 12 of the requirements for these permit units.
- Condition 14 from the PTO was included as condition 13 of the requirements for these permit units.
- Condition 15 from the PTO was included as condition 14 of the requirements for these permit units.
- Condition 16 from the PTO was included as condition 15 of the requirements for these permit units.

- Condition 17 from the PTO was included as condition 16 of the requirements for these permit units.
- Condition 18 from the PTO was included as condition 17 of the requirements for these permit units.
- Condition 19 from the PTO was included as condition 18 of the requirements for these permit units.
- Condition 20 from the PTO was included as condition 19 of the requirements for these permit units.
- Condition 21 from the PTO was included as condition 20 of the requirements for these permit units.
- Condition 22 from the PTO was included as condition 25 of the requirements for these permit units.

o. Steam Generator (S-1372-33-15)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-33-15)
- Condition 2 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-33-15)
- Condition 3 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-33-15)
- Condition 4 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-33-15)
- Condition 5 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-33-15)
- Condition 6 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-33-15)
- Condition 7 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-33-15)
- Condition 8 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-33-15)
- Condition 9 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-33-15)
- Condition 10 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-33-15)
- Condition 11 from the PTO was included as condition 11 of the requirements for permit unit (S-1372-33-15)

- Condition 12 from the PTO was included as condition 12 of the requirements for permit unit (S-1372-33-15)
- Condition 13 from the PTO was included as condition 13 of the requirements for permit unit (S-1372-33-15)
- Condition 14 from the PTO was included as condition 14 of the requirements for permit unit (S-1372-33-15)
- Condition 15 from the PTO was included as condition 15 of the requirements for permit unit (S-1372-33-15)
- Condition 16 from the PTO was included as condition 16 of the requirements for permit unit (S-1372-33-15)
- Condition 17 from the PTO was included as condition 17 of the requirements for permit unit (S-1372-33-15)
- Condition 18 from the PTO was included as condition 18 of the requirements for permit unit (S-1372-33-15)
- Condition 19 from the PTO was included as condition 19 of the requirements for permit unit (S-1372-33-15)
- Condition 20 from the PTO was included as condition 20 of the requirements for permit unit (S-1372-33-15)
- Condition 21 from the PTO was included as condition 21 of the requirements for permit unit (S-1372-33-15)
- Condition 22 from the PTO was included as condition 24 of the requirements for permit unit (S-1372-33-15)

p. Steam Generator (S-1372-34-15)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 22 of the facility wide requirements (S-1372-0-1). Condition 22 of the facility wide requirements specifies a limit of 20% opacity for no more than three minutes in any one-hour period.
- Condition 2 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-34-15)
- Condition 3 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-34-15)
- Condition 4 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-34-15)
- Condition 5 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-34-15)

- Condition 6 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-34-15)
- Condition 7 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-34-15)
- Condition 8 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-34-15)
- Condition 9 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-34-15)
- Condition 10 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-34-15)
- Condition 11 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-34-15)
- Condition 12 from the PTO was included as condition 11 of the requirements for permit unit (S-1372-34-15)
- Condition 13 from the PTO was included as condition 12 of the requirements for permit unit (S-1372-34-15)
- Condition 14 from the PTO was included as condition 13 of the requirements for permit unit (S-1372-34-15)
- Condition 15 from the PTO was included as condition 14 of the requirements for permit unit (S-1372-34-15)
- Condition 16 from the PTO was included as condition 15 of the requirements for permit unit (S-1372-34-15)
- Condition 17 from the PTO was included as condition 16 of the requirements for permit unit (S-1372-34-15)
- Condition 18 from the PTO was included as condition 17 of the requirements for permit unit (S-1372-34-15)
- Condition 19 from the PTO was included as condition 18 of the requirements for permit unit (S-1372-34-15)
- Condition 20 from the PTO was included as condition 23 of the requirements for permit unit (S-1372-34-15)

q. Steam Generator (S-1372-111-5)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-111-5)

- Condition 2 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-111-5)
- Condition 3 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-111-5)
- Condition 4 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-111-5)
- Condition 5 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-111-5)
- Condition 6 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-111-5)
- Condition 7 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-111-5)
- Condition 8 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-111-5)
- Condition 9 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-111-5)
- Condition 10 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-111-5)
- Condition 11 from the PTO was included as condition 11 of the requirements for permit unit (S-1372-111-5)
- Condition 12 from the PTO was included as condition 12 of the requirements for permit unit (S-1372-111-5)
- Condition 13 from the PTO was included as condition 13 of the requirements for permit unit (S-1372-111-5)
- Condition 14 from the PTO was included as condition 14 of the requirements for permit unit (S-1372-111-5)
- Condition 15 from the PTO was included as condition 15 of the requirements for permit unit (S-1372-111-5)
- Condition 16 from the PTO was included as condition 16 of the requirements for permit unit (S-1372-111-5)

r. Steam Generators (S-1372-112-6 and –113-7)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements.

- Condition 2 from the PTO was included as condition 1 of the requirements for these permit units.
- Condition 3 from the PTO was included in condition 2 of the facility wide requirements (S-1372-0-1).
- Condition 4 from the PTO was included as condition 3 of the requirements for these permit units.
- Condition 5 from the PTO was included as condition 4 of the requirements for these permit units.
- Condition 6 from the PTO was included as condition 5 of the requirements for these permit units.
- Condition 7 from the PTO was included as condition 6 of the requirements for these permit units.
- Condition 8 from the PTO was included as condition 7 of the requirements for these permit units.
- Condition 9 from the PTO was included as condition 9 of the requirements for these permit units.
- Condition 10 from the PTO was included as condition 10 of the requirements for these permit units.
- Condition 11 from the PTO was included as condition 11 of the requirements for these permit units.
- Condition 12 from the PTO was included as condition 12 of the requirements for these permit units.
- Condition 13 from the PTO was included as condition 13 of the requirements for these permit units.
- Condition 14 from the PTO was included as condition 14 of the requirements for these permit units.
- Condition 15 from the PTO was included as condition 15 of the requirements for these permit units.
- Condition 16 from the PTO was included as condition 21 of the requirements for these permit units.

s. Steam Generators (S-1372-127-11)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 22 of the facility wide requirements (S-1372-0-1). Condition 22 of the facility wide requirements specifies a limit of 20% opacity for no more than three minutes in any one-hour period.

- Condition 2 from the PTO was included as condition 14 of the requirements for permit unit (S-1372-127-11)
- Condition 3 from the PTO was included as condition 15 of the requirements for permit unit (S-1372-127-11)
- Condition 4 from the PTO was included as condition 16 of the requirements for permit unit (S-1372-127-11)
- Condition 5 from the PTO was included as condition 17 of the requirements for permit unit (S-1372-127-11)
- Condition 6 from the PTO was included as condition 18 of the requirements for permit unit (S-1372-127-11)
- Condition 7 from the PTO was included as condition 19 of the requirements for permit unit (S-1372-127-11)
- Condition 8 from the PTO was included as condition 20 of the requirements for permit unit (S-1372-127-11)
- Condition 9 from the PTO was included as condition 21 of the requirements for permit unit (S-1372-127-11)
- Condition 10 from the PTO was included as condition 22 of the requirements for permit unit (S-1372-127-11))
- Condition 11 from the PTO was included as condition 23 of the requirements for permit unit (S-1372-127-11)
- Condition 12 from the PTO was included as condition 24 of the requirements for permit unit (S-1372-127-11)
- Condition 13 from the PTO was included as condition 25 of the requirements for permit unit (S-1372-127-11)
- Condition 14 from the PTO was included as condition 26 of the requirements for permit unit (S-1372-127-11)
- Condition 15 from the PTO was included as condition 27 of the requirements for permit unit (S-1372-127-11)
- Condition 16 from the PTO was subsumed by NSR condition 17 from the PTO. Condition 17 required a retention time of five years and therefore subsumed this condition.
- Condition 17 from the PTO was included as condition 29 of the requirements for permit unit (S-1372-127-11)

t. Dormant Steam Generators (-137-4)

These units have been identified by permit conditions as being dormant units. These units will not be evaluated at this time.

- Conditions 1 through 5 from the PTOs were included as conditions 2 through 6 of the requirements for these permit units without change. These permit units have been made inoperative and are now dormant.

u. Steam Generators (S-1372-139-1)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-139-1)
- Condition 2 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-139-1)
- Condition 3 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-139-1). The record retention time was changed from 2 years to 5 years to comply with District Rule 2520, 9.5.2.

v. Steam Generators (S-1372-140-1, -141-1, 142-1, -143-1, -144-1, -145-2, -146-2, -147-1, -148, -149-1, -151-1, and -152-1)

These permit units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTOs was included in condition 22 of the facility wide requirements (S-1372-0-1). Condition 22 of the facility wide requirements specifies a limit of 20% opacity for no more than three minutes in any one-hour period.
- Condition 2 from the PTO was included as condition 13 of the requirements for these permit units.
- Condition 3 from the PTO was included in condition 6 of the requirements for these permit units.
- Condition 4 from the PTO was included as condition 1 of the requirements for these permit units.
- Condition 5 from the PTO was included as condition 2 of the requirements for these permit units.

w. Steam Generator (S-1372-150-1)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 22 of the facility wide requirements (S-1372-0-1). Condition 22 of the facility wide requirements specifies a limit of 20% opacity for no more than three minutes in any one-hour period.
- Condition 2 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-150-1)
- Condition 3 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-150-1)
- Condition 4 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-150-1)
- Condition 5 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-150-1)
- Condition 6 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-150-1)
- Condition 7 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-150-1)
- Condition 8 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-150-1)
- Condition 9 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-150-1)
- Condition 10 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-150-1)
- Condition 11 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-150-1)
- Condition 12 from the PTO was included as condition 11 of the requirements for permit unit (S-1372-150-1). The record retention time was changed from 2 years to 5 years to comply with District Rule 2520, 9.5.2.
- Condition 13 from the PTO was included as condition 12 of the requirements for permit unit (S-1372-150-1)

x. Steam Generators (S-1372-317-2, -318-3)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions

from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 1 of the requirements for these permit units.
- Condition 2 from the PTO was included as condition 2 of the requirements for these permit units.
- Condition 3 from the PTO was included in condition 3 of the requirements for these permit units.
- Condition 4 from the PTO was included as condition 4 of the requirements for these permit units.
- Condition 5 from the PTO was included as condition 5 of the requirements for these permit units.
- Condition 6 from the PTO was included as condition 6 of the requirements for these permit units.
- Condition 7 from the PTO was included as condition 7 of the requirements for these permit units.
- Condition 8 from the PTO was included as condition 8 of the requirements for these permit units.
- Condition 9 from the PTO was included as condition 9 of the requirements for these permit units.
- Condition 10 from the PTO was included as condition 10 of the requirements for these permit units.
- Condition 11 from the PTO was included as condition 11 of the requirements for these permit units.
- Condition 12 from the PTO was included as condition 12 of the requirements for these permit units.
- Condition 13 from the PTO was included as condition 13 of the requirements for these permit units.
- Condition 14 from the PTO was included as condition 14 of the requirements for these permit units.
- Condition 15 from the PTO was included as condition 15 of the requirements for these permit units.
- Condition 16 from the PTO was included as condition 20 of the requirements for these permit units. The record retention time was changed from 2 years to 5 years to comply with District Rule 2520, 9.5.2.

y. • Steam Generator (S-1372-319-2)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions

from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 1 of the requirements for this permit unit.
- Condition 2 from the PTO was included as condition 2 of the requirements for this permit unit.
- Condition 3 from the PTO was included in condition 3 of the facility wide requirements (S-1372-0-1).
- Condition 4 from the PTO was included as condition 4 of the requirements for this permit unit.
- Condition 5 from the PTO was included as condition 5 of the requirements for this permit unit.
- Condition 6 from the PTO was included as condition 6 of the requirements for this permit unit.
- Condition 7 from the PTO was included as condition 7 of the requirements for this permit unit.
- Condition 8 from the PTO was included as condition 8 of the requirements for this permit unit.
- Condition 9 from the PTO was included as condition 9 of the requirements for this permit unit.
- Condition 10 from the PTO was included as condition 10 of the requirements for this permit unit.
- Condition 11 from the PTO was included as condition 11 of the requirements for this permit unit.
- Condition 12 from the PTO was included as condition 12 of the requirements for this permit unit.
- Condition 13 from the PTO was included as condition 13 of the requirements for this permit unit.
- Condition 14 from the PTO was included as condition 14 of the requirements for this permit unit.
- Condition 15 from the PTO was included as condition 15 of the requirements for this permit unit.
- Condition 16 from the PTO was included as condition 19 of the requirements for this permit unit.

z. Steam Generator (S-1372-334-3)

S-1372-334-4 was subject to the NSR Rule at the time the applicant applied for the Authority to Construct (ATC). The following conditions from ATC S-1372-334-4, issued by SJVAPCD on 6/1/00, will be used to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the ATC was not included because this condition has been satisfied and is now obsolete. ATC S-1372-334-2 has been implemented into operating permit S-1372-334-2.
- Condition 2 from the ATC was included as condition 1 of the requirements for this permit unit.
- Condition 3 from the ATC was included in condition 2 of the facility wide requirements (S-1372-0-1).
- Condition 4 from the ATC was included as condition 3 of the requirements for this permit unit.
- Condition 5 and 6 from the ATC were included as conditions 4 and 5 of the requirements for this permit unit.
- Condition 7 from the ATC was included as condition 6 of the requirements for this permit unit.
- Condition 8 from the ATC was included as condition 7 of the requirements for this permit unit.
- Condition 9 from the ATC was not included. This unit was transferred from a Texaco facility, but condition 9 was mistakenly kept. Nuevo doesn't own the property listed in this condition and doesn't provide steam to this location. The referenced location listed in this condition is ~25 miles from this unit.
- Condition 10 from the ATC was included as condition 9 of the requirements for this permit unit.
- Condition 11 from the ATC was included as condition 10 of the requirements for this permit unit.
- Condition 12 from the ATC was included as condition 11 of the requirements for this permit unit.
- Condition 13 from the ATC was included as condition 12 of the requirements for this permit unit.
- Condition 14 from the ATC was included as condition 13 of the requirements for this permit unit.
- Condition 15 from the ATC was included as condition 14 of the requirements for this permit unit.
- Condition 16 from the ATC was included as condition 15 of the requirements for this permit unit.
- Condition 17 from the ATC was included as condition 16 of the requirements for this permit unit.
- Condition 18 from the ATC was included as condition 17 of the requirements for this permit unit.
- Condition 19 from the ATC was included as condition 18 of the requirements for this permit unit.
- Condition 20 from the ATC was included as condition 19 of the requirements for this permit unit.

- Condition 21 from the ATC was included as condition 20 of the requirements for this permit unit.
- Condition 22 from the PTO was included as condition 21 of the requirements for permit unit (S-1372-24-18)

aa. Steam Generator (S-1372-355-2)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 through 13 from the PTO was included as condition 1 through 13 of the requirements for this permit unit.

bb. Steam Generator (S-1372-356-2)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 through 17 from the PTO was included as condition 1 through 17 of the requirements for this permit unit.
- Condition 18 from the PTO was not included as in the requirements for this permit unit because it is an obsolete startup requirement that has been satisfied.
- Condition 19 through 22 from the PTO was included as condition 18 through 21 of the requirements for this permit unit.

cc. Steam Generator (S-1372-357-2)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 1 of the requirements for these permit units.
- Condition 2 from the PTO was included as condition 2 of the requirements for these permit units.
- Condition 3 from the PTO was included in condition 3 of the facility wide requirements (S-1372-0-1).
- Condition 4 from the PTO was included as condition 4 of the requirements for these permit units.
- Condition 5 from the PTO was included as condition 5 of the requirements for these permit units.
- Condition 6 from the PTO was included as condition 6 of the requirements for these permit units.
- Condition 7 from the PTO was included as condition 7 of the requirements for these permit units.
- Condition 8 from the PTO was included as condition 8 of the requirements for these permit units.
- Condition 9 from the PTO was included as condition 9 of the requirements for these permit units.
- Condition 10 from the PTO was included as condition 10 of the requirements for these permit units.
- Condition 11 from the PTO was included as condition 11 of the requirements for these permit units.
- Condition 12 from the PTO was included as condition 12 of the requirements for these permit units.
- Condition 13 from the PTO was included as condition 13 of the requirements for these permit units.
- Condition 14 from the PTO was included as condition 18 of the requirements for these permit units.

dd. Steam Generator (S-1372-358-2)

S-1372-358-1 was subject to the NSR Rule at the time the applicant applied for the Authority to Construct (ATC). The following conditions from ATC S-1372-358-1, issued by SJVAPCD on 6/8/00, will be used to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 3 from the ATC were not included because these conditions have been satisfied and are now obsolete. ATC S-1372-358-1 removes the dormant status.
- Condition 4 from the ATC was included as condition 1 of the requirements for this permit unit.
- Condition 5 from the ATC was included in condition 2 of the facility wide requirements (S-1372-0-1).

- Condition 6 from the ATC was included as condition 3 of the requirements for this permit unit.
- Condition 7 from the ATC was included as condition 4 of the requirements for this permit unit.
- Condition 8 from the ATC was included as condition 5 of the requirements for this permit unit.
- Condition 9 from the ATC was included as condition 6 of the requirements for this permit unit.
- Condition 10 from the ATC was included as condition 7 of the requirements for this permit unit.
- Condition 11 from the ATC was included as condition 8 of the requirements for this permit unit.
- Condition 12 from the ATC was included as condition 9 of the requirements for this permit unit.
- Condition 13 from the ATC was included as condition 10 of the requirements for this permit unit.
- Condition 14 from the ATC was included as condition 11 of the requirements for this permit unit.
- Condition 15 from the ATC was included as condition 12 of the requirements for this permit unit.
- Condition 16 from the ATC was included as condition 13 of the requirements for this permit unit.
- Condition 17 from the ATC was included as condition 14 of the requirements for this permit unit.
- Condition 18 from the ATC was included as condition 15 of the requirements for this permit unit.

ee. Steam Generator (S-1372-359-2)

S-1372-359-1 was subject to the NSR Rule at the time the applicant applied for the Authority to Construct (ATC). The following conditions from ATC S-1372-359-1, issued by SJVAPCD on 6/8/00, will be used to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the ATC was included as condition 1 of the facility wide requirements.
- Condition 2 from the ATC was included as condition 2 of the requirements for these permit units.
- Condition 3 from the ATC was included in condition 3 of the facility wide requirements (S-1372-0-1).
- Condition 4 from the ATC was included as condition 4 of the requirements for these permit units.
- Condition 5 from the ATC was included as condition 5 of the requirements for these permit units.

- Condition 6 from the ATC was included as condition 6 of the requirements for these permit units.
- Condition 7 from the ATC was included as condition 7 of the requirements for these permit units.
- Condition 8 from the ATC was included as condition 8 of the requirements for these permit units.
- Condition 9 from the ATC was included as condition 9 of the requirements for these permit units.
- Condition 10 from the ATC was included as condition 10 of the requirements for these permit units.
- Condition 11 from the ATC was included as condition 11 of the requirements for these permit units.
- Condition 12 from the ATC was included as condition 12 of the requirements for these permit units.
- Condition 13 from the ATC was included as condition 13 of the requirements for these permit units.
- Condition 14 from the ATC was not included in the requirements for these permit units. This is a startup condition and the offsets will be provided.
- Condition 15 from the ATC was included as condition 18 of the requirements for these permit units.

ff. Well Vents with flare (S-1372-74-04)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 17 of the requirements for permit unit (S-1372-74-4).
- Condition 2 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-74-4)
- Condition 3 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-74-4)
- Condition 4 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-74-4)
- Condition 5 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-74-4)
- Condition 6 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-74-4)

- Condition 7 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-74-4)
- Condition 8 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-74-4)
- Condition 9 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-74-4)
- Condition 10 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-74-4)
- Condition 11 from the PTO was included in condition 19 of the requirements for permit unit (S-1372-74-4)
- Condition 12 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-74-4)
- Condition 13 from the PTO was included as condition 11 of the requirements for permit unit (S-1372-74-4)

gg. Well Vents with flare (S-1372-76-12)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 19 of the requirements for permit unit (S-1372-76-12).
- Condition 2 from the PTO was included in condition 21 of the requirements for permit unit (S-1372-76-12).
- Condition 3 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-76-12).
- Condition 4 from the PTO was not applicable to this unit and was therefore not included in the requirements for permit unit (S-1372-76-12).
- Condition 5 from the PTO was included in condition 21 of the requirements for permit unit (S-1372-76-12).
- Condition 6 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-76-12).
- Condition 7 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-76-12).
- Condition 8 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-76-12).
- Condition 9 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-76-12).

- Condition 10 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-76-12).
- Condition 11 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-76-12).
- Condition 12 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-76-12).
- Condition 13 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-76-12).
- Condition 14 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-76-12).
- Condition 15 from the PTO was included as condition 11 of the requirements for permit unit (S-1372-76-12).
- Condition 16 from the PTO was included as condition 12 of the requirements for permit unit (S-1372-76-12).
- Condition 17 from the PTO was included as condition 13 of the requirements for permit unit (S-1372-76-12).

hh. Well Vents with flare (S-1372-77-12)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 20 of the requirements for permit unit (S-1372-77-12).
- Condition 2 from the PTO was included in condition 22 of the requirements for permit unit (S-1372-77-12).
- Condition 3 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-77-12).
- Condition 4 from the PTO was not applicable to this unit and was therefore not included in the requirements for permit unit (S-1372-77-12).
- Condition 5 from the PTO was included in condition 21 of the requirements for permit unit (S-1372-77-12).
- Condition 6 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-77-12).
- Condition 7 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-77-12).
- Condition 8 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-77-12).

- Condition 9 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-77-12).
- Condition 10 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-77-12).
- Condition 11 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-77-12).
- Condition 12 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-77-12).
- Condition 13 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-77-12).
- Condition 14 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-77-12).
- Condition 15 from the PTO was included as condition 11 of the requirements for permit unit (S-1372-77-12).
- Condition 16 from the PTO was included as condition 12 of the requirements for permit unit (S-1372-77-12).
- Condition 17 from the PTO was included as condition 13 of the requirements for permit unit (S-1372-77-12).
- Condition 18 from the PTO was included as condition 13 of the requirements for permit unit (S-1372-77-12).
- Condition 19 from the PTO was obsolete and was therefore not included in the requirements for permit unit (S-1372-77-12).

ii. Well Vents with flare (S-1372-87-6)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 1 of the requirements for permit unit (S-1372-87-6).
- Condition 2 from the PTO was included in condition 23 of the requirements for permit unit (S-1372-87-6).
- Condition 3 from the PTO was included in condition 21 of the requirements for permit unit (S-1372-87-6).
- Condition 4 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-87-6).
- Condition 5 from the PTO was included in condition 3 of the requirements for permit unit (S-1372-87-6).

- Condition 6 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-87-6).
- Condition 7 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-87-6).
- Condition 8 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-87-6).
- Condition 9 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-87-6).
- Condition 10 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-87-6).
- Condition 11 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-87-6).
- Condition 12 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-87-6).
- Condition 13 from the PTO was included as condition 11 of the requirements for permit unit (S-1372-87-6).
- Condition 14 from the PTO was included as condition 12 of the requirements for permit unit (S-1372-87-6).

jj. Well Vents with flare (S-1372-99-4)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 15 of the requirements for permit unit (S-1372-99-4).
- Condition 2 from the PTO was included in condition 21 of the requirements for permit unit (S-1372-99-4).
- Condition 3 from the PTO was included in condition 1 of the requirements for permit unit (S-1372-99-4).
- Condition 4 from the PTO was included as condition 17 of the requirements for permit unit (S-1372-99-4).
- Condition 5 from the PTO was included in condition 2 of the requirements for permit unit (S-1372-99-4).
- Condition 6 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-99-4).
- Condition 7 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-99-4).
- Condition 8 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-99-4).

- Condition 9 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-99-4).
- Condition 10 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-99-4).
- Condition 11 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-99-4).
- Condition 12 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-99-4).

kk. Well Vents with flare (S-1372-100-6)

S-1372-100-10 was subject to the NSR Rule at the time the applicant applied for the Authority to Construct (ATC). The following conditions from ATC S-1372-100-10, issued by SJVAPCD on 9/19/00, will be used to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the ATC was included in condition 40 of the facility wide requirements (S-1372-0-1). This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the ATC was included in condition 22 of the facility wide requirements (S-1372-0-1).
- Condition 3 from the ATC was included in condition 1 of the requirements for permit unit (S-1372-100-6).
- Condition 4 from the ATC was included as condition 2 of the requirements for permit unit (S-1372-100-6).
- Condition 5 from the ATC was included in condition 23 of the requirements for permit unit (S-1372-100-6).
- Condition 6 from the ATC was included as condition 3 of the requirements for permit unit (S-1372-100-6).
- Condition 7 from the ATC was included in condition 25 of the requirements for permit unit (S-1372-100-6).
- Condition 8 from the ATC was included as condition 4 of the requirements for permit unit (S-1372-100-6).
- Condition 9 from the ATC was included as condition 5 of the requirements for permit unit (S-1372-100-6).
- Condition 10 from the ATC was included as condition 6 of the requirements for permit unit (S-1372-100-6).
- Condition 11 from the ATC was included as condition 7 of the requirements for permit unit (S-1372-100-6).
- Condition 12 from the ATC was included as condition 8 of the requirements for permit unit (S-1372-100-6).

- Condition 13 from the ATC was included as condition 9 of the requirements for permit unit (S-1372-100-6).
- Condition 14 from the ATC was included as condition 10 of the requirements for permit unit (S-1372-100-6).
- Condition 15 from the ATC was included as condition 11 of the requirements for permit unit (S-1372-100-6).
- Condition 16 from the ATC was included as condition 12 of the requirements for permit unit (S-1372-100-6).
- Condition 17 from the ATC was included as condition 13 of the requirements for permit unit (S-1372-100-6).
- Condition 18 from the ATC was included as condition 14 of the requirements for permit unit (S-1372-100-6).
- Conditions 19 and 20 from the ATC were not included because these conditions are now obsolete. ATC S-1372-100-9 has been implemented and PTO S-1372-346 has been cancelled.

II. Well Vents with flare (S-1372-126-10)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO was included in condition 40 of the facility wide requirements (S-1372-0-1). This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the PTO was included in condition 19 of the requirements for permit unit (S-1372-126-10).
- Condition 3 from the PTO was included in condition 1 of the requirements for permit unit (S-1372-126-10).
- Condition 4 from the PTO was included as condition 25 of the requirements for permit unit (S-1372-126-10).
- Condition 5 from the PTO was included in condition 2 of the requirements for permit unit (S-1372-126-10).
- Condition 6 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-126-10).
- Condition 7 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-126-10).
- Condition 8 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-126-10).

- Condition 9 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-126-10).
- Condition 10 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-126-10)/
- Condition 11 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-126-10).
- Condition 12 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-126-10).
- Condition 13 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-126-10).
- Condition 14 from the PTO was included as condition 11 of the requirements for permit unit (S-1372-126-10).
- Condition 15 from the PTO was included as condition 12 of the requirements for permit unit (S-1372-126-10).
- Condition 16 from the PTO was included as condition 13 of the requirements for permit unit (S-1372-126-10).

mm. Uncontrolled Cyclic Well Vents (S-1372-308-4)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO was included in condition 40 of the facility wide requirements (S-1372-0-1). This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the PTO was not applicable to this unit and was therefore not included in the requirements for permit unit (S-1372-308-4).
- Condition 3 from the PTO was included in condition 4 of the requirements for permit unit (S-1372-308-4).
- Condition 4 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-308-4).
- Condition 5 from the PTO was included in condition 2 of the requirements for permit unit (S-1372-308-4).
- Condition 6 from the PTO was included in condition 3 of the requirements for permit unit (S-1372-308-4).

nn. Well Vents with flare (S-1372-312-4)

S-1372-312-6 was subject to the NSR Rule at the time the applicant applied for the Authority to Construct (ATC). The following conditions from ATC S-1372-312-6, issued by SJVAPCD on 1/29/2001, will be used to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the ATC was included as condition 1 of the requirements for permit unit (S-1372-312-4).
- Condition 2 from the ATC was included as condition 2 of the requirements for permit unit (S-1372-312-4).
- Condition 3 from the ATC was included as condition 3 of the requirements for permit unit (S-1372-312-4).
- Condition 4 from the ATC was included as condition 4 of the requirements for permit unit (S-1372-312-4).
- Condition 5 from the ATC was included in condition 5 of the requirements for permit unit (S-1372-312-4).
- Condition 6 from the ATC was included as condition 6 of the requirements for permit unit (S-1372-312-4).
- Condition 7 from the ATC was included as condition 7 of the requirements for permit unit (S-1372-312-4).
- Condition 8 from the ATC was included as condition 8 of the requirements for permit unit (S-1372-312-4).
- Conditions 9 and 10 from the ATC were included as condition 25 of the requirements for permit unit (S-1372-312-4).
- Condition 11 from the ATC was included as condition 9 of the requirements for permit unit (S-1372-312-4).
- Condition 12 from the ATC was included in condition 23 of the requirements for permit unit (S-1372-312-4).
- Condition 13 from the ATC was included as condition 10 of the requirements for permit unit (S-1372-312-4).
- Condition 14 from the ATC was included as condition 11 of the requirements for permit unit (S-1372-312-4).
- Condition 15 from the ATC was included in condition 12 of the requirements for permit unit (S-1372-312-4).
- Condition 16 from the ATC was included as condition 13 of the requirements for permit unit (S-1372-312-4).
- Condition 17 from the ATC was included as condition 14 of the requirements for permit unit (S-1372-312-4).
- Condition 18 from the ATC was included as condition 22 of the requirements for permit unit (S-1372-312-4).
- Conditions 19 and 20 from the ATC were not included as condition 15 of the requirements for this permit unit because the conditions are obsolete. The ATCs listed in these conditions have been implemented.

oo. Well Vents with flare (S-1372-316-2)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-316-2)
- Condition 2 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-316-2)
- Condition 3 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-316-2)
- Condition 4 from the PTO was included as condition 18 of the requirements for permit unit (S-1372-316-2)
- Condition 5 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-316-2)
- Condition 6 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-316-2)
- Condition 7 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-316-2)
- Condition 8 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-316-2)
- Condition 9 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-316-2)
- Condition 10 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-316-2)

pp. Well Vents (S-1372-346-1)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-346-1)
- Condition 2 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-346-1). **THE PERMIT UNITS REFERENCED IN THIS CONDITION ARE NO**

LONGER VALID. THIS REFERENCE NEEDS TO BE CORRECTED BEFORE ISSUANCE OF THE TITLE V PERMIT.

- Condition 3 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-346-1)
- Condition 4 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-346-1)
- Condition 5 from the PTO was included as condition 24 of the requirements for permit unit (S-1372-346-1)

qq. Gas Turbine Engine (S-1372-187-7)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 26 of the requirements for permit unit (S-1372-187-7).
- Condition 2 from the PTO was included as condition 27 of the requirements for permit unit (S-1372-187-7)
- Condition 3 from the PTO was included as condition 28 of the requirements for permit unit (S-1372-187-7)
- Condition 4 from the PTO was included as condition 29 of the requirements for permit unit (S-1372-187-7)
- Condition 5 from the PTO was included as condition 30 of the requirements for permit unit (S-1372-187-7)
- Condition 6 from the PTO was included as condition 31 of the requirements for permit unit (S-1372-187-7)
- Condition 7 from the PTO was included as condition 32 of the requirements for permit unit (S-1372-187-7)
- Condition 8 from the PTO was included as condition 33 of the requirements for permit unit (S-1372-187-7)
- Condition 9 from the PTO was included as condition 34 of the requirements for permit unit (S-1372-187-7)
- Condition 10 from the PTO was included as condition 35 of the requirements for permit unit (S-1372-187-7)
- Condition 11 from the PTO was included as condition 36 of the requirements for permit unit (S-1372-187-7)
- Condition 12 from the PTO was included as condition 37 of the requirements for permit unit (S-1372-187-7)

- Condition 13 from the PTO was included as condition 38 of the requirements for permit unit (S-1372-187-7)
- Condition 14 from the PTO was included as condition 3, 4, 5, 6, 7, 8, 9, 10, 11, and 14 of the requirements for permit unit (S-1372-187-7)

rr. Gas Turbine Engine (S-1372-188-6)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 26 of the requirements for permit unit (S-1372-188-6).
- Condition 2 from the PTO was included as condition 27 of the requirements for permit unit (S-1372-188-6)
- Condition 3 from the PTO was included as condition 28 of the requirements for permit unit (S-1372-188-6)
- Condition 4 from the PTO was included as condition 29 of the requirements for permit unit (S-1372-188-6)
- Condition 5 from the PTO was included as condition 30 of the requirements for permit unit (S-1372-188-6)
- Condition 6 from the PTO was included as condition 31 of the requirements for permit unit (S-1372-188-6)
- Condition 7 from the PTO was included as condition 32 of the requirements for permit unit (S-1372-188-6)
- Condition 8 from the PTO was included as condition 33 of the requirements for permit unit (S-1372-188-6)
- Condition 9 from the PTO was included as condition 34 of the requirements for permit unit (S-1372-188-6)
- Condition 10 from the PTO was included as condition 35 of the requirements for permit unit (S-1372-188-6)
- Condition 11 from the PTO was included as condition 36 of the requirements for permit unit (S-1372-188-6)
- Condition 12 from the PTO was included as condition 37 of the requirements for permit unit (S-1372-188-6)
- Condition 13 from the PTO was included as condition 38 of the requirements for permit unit (S-1372-188-6)
- Condition 14 from the PTO was included as condition 39 of the requirements for permit unit (S-1372-188-6)

- Condition 15 from the PTO was included as condition 40 of the requirements for permit unit (S-1372-188-6)

ss. Gas Turbine Engine (S-1372-194-8)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 26 of the requirements for permit unit (S-1372-194-8).
- Condition 2 from the PTO was included as condition 27 of the requirements for permit unit (S-1372-194-8)
- Condition 3 from the PTO was included as condition 28 of the requirements for permit unit (S-1372-194-8)
- Condition 4 from the PTO was included as condition 29 of the requirements for permit unit (S-1372-194-8)
- Condition 5 from the PTO was included as condition 30 of the requirements for permit unit (S-1372-194-8)
- Condition 6 from the PTO was included as condition 31 of the requirements for permit unit (S-1372-194-8)
- Condition 7 from the PTO was included as condition 32 of the requirements for permit unit (S-1372-194-8)
- Condition 8 from the PTO was included as condition 33 of the requirements for permit unit (S-1372-194-8)
- Condition 9 from the PTO was included as condition 34 of the requirements for permit unit (S-1372-194-8)
- Condition 10 from the PTO was included as condition 35 of the requirements for permit unit (S-1372-194-8))
- Condition 11 from the PTO was included as condition 36 of the requirements for permit unit (S-1372-194-8)
- Condition 12 from the PTO was included as condition 37 of the requirements for permit unit (S-1372-194-8)
- Condition 13 from the PTO was included as condition 38 of the requirements for permit unit (S-1372-194-8)
- Condition 14 from the PTO was included as condition 39 of the requirements for permit unit (S-1372-194-8)
- Condition 15 from the PTO was included as condition 40 of the requirements for permit unit (S-1372-194-8). The record retention time was changed from 2 years to 5 years to comply with District Rule 2520, 9.5.2.

tt. Fixed Roof Tank (S-1372-93-2)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-93-2).
- Condition 2 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-93-2).
- Condition 3 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-93-2).
- Condition 4 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-93-2).
- Condition 5 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-93-2).
- Condition 6 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-93-2).
- Condition 7 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-93-2). The record retention time was changed from 2 years to 5 years to comply with District Rule 2520, 9.5.2 and is included in the facility wide requirements.

uu. Fixed Roof Tank (S-1372-94-4)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-94-4).
- Condition 2 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-94-4).
- Condition 3 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-94-4).
- Condition 4 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-94-4).

- Condition 5 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-94-4).
- Condition 6 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-94-4).
- Condition 7 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-94-4). The record retention time was changed from 2 years to 5 years to comply with District Rule 2520, 9.5.2 and is included in the facility wide requirements.

vv. Fixed Roof Tank (S-1372-95-3)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-95-3).
- Condition 2 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-95-3).
- Condition 3 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-95-3).
- Condition 4 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-95-3).
- Condition 5 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-95-3).
- Condition 6 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-95-3). The record retention time was changed from 2 years to 5 years to comply with District Rule 2520, 9.5.2 and is included in the facility wide requirements.

ww. Fixed Roof Tank (S-1372-96-3)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements (S-1372-0-1). This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-96-3).
- Condition 3 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-96-3).
- Condition 4 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-96-3).
- Condition 5 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-96-3).
- Condition 6 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-96-3).
- Condition 7 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-96-3).
- Condition 8 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-96-3). The record retention time was changed from 2 years to 5 years to comply with District Rule 2520, 9.5.2 and is included in the facility wide requirements.

xx. Sump Replacement Tanks (S-1372-114-1, -115-1, -116-1, and –117-1)

These permit units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTOs was included as condition 1 of the requirements for permit units (S-1372-114-1, -115-1, -116-1, and –117-1).
- Condition 2 from the PTOs was included as condition 4 of the requirements for permit units (S-1372-114-1, -115-1, -116-1, and –117-1).
- Condition 3 from the PTOs was included as condition 2 of the requirements for permit units (S-1372-114-1, -115-1, -116-1, and –117-1).
- Condition 4 from the PTOs was included as condition 3 of the requirements for permit units (S-1372-114-1, -115-1, -116-1, and –117-1).

- Condition 5 from the PTOs was included as condition 6 of the requirements for permit units (S-1372-114-1, -115-1, -116-1, and -117-1).

yy. Wash Tank (S-1372-128-2)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-128-2).
- Condition 2 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-128-2).
- Condition 3 from the PTO was included as condition 11 of the requirements for permit unit (S-1372-128-2).
- Condition 4 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-128-2).
- Condition 5 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-128-2).
- Condition 6 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-128-2).
- Condition 7 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-128-2).
- Condition 8 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-128-2).
- Condition 9 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-128-2).
- Condition 10 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-128-2).
- Condition 11 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-128-2).
- Condition 12 from the PTO was included as condition 28 of the requirements for permit unit (S-1372-128-2).

zz. Production Tanks (S-1372-131-2)

These permit units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions

from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTOs was included as condition 33 of the requirements for permit units (S-1372-131-2).
- Condition 2 from the PTOs was included as condition 1 of the requirements for permit units (S-1372-131-2).
- Condition 3 from the PTOs was included as condition 2 of the requirements for permit units (S-1372-131-2).
- Condition 4 from the PTOs was included as condition 3 of the requirements for permit units (S-1372-131-2).
- Condition 5 from the PTOs was included as condition 4 of the requirements for permit units (S-1372-131-2).
- Condition 6 from the PTOs was included as condition 5 of the requirements for permit units (S-1372-131-2).
- Condition 7 from the PTOs was included as condition 6 of the requirements for permit units (S-1372-131-2).
- Condition 8 from the PTOs was included as condition 7 of the requirements for permit units (S-1372-131-2).
- Condition 9 from the PTOs was included as condition 8 of the requirements for permit units (S-1372-131-2).
- Condition 10 from the PTOs was included as condition 9 of the requirements for permit units (S-1372-131-2).
- Condition 11 from the PTOs was included as condition 10 of the requirements for permit units (S-1372-131-2).
- Condition 12 from the PTOs was included as condition 11 of the requirements for permit units (S-1372-131-2).
- Condition 13 from the PTOs was included as condition 12 of the requirements for permit units (S-1372-131-2).
- Condition 14 from the PTOs was included as condition 13 of the requirements for permit units (S-1372-131-2).

aaa. Production Tanks (S-1372-129-1, -132-2, -135-1)

These permit units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTOs was included as condition 1 of the requirements for permit units (S-1372-129-1, -132-2, -135-1).

- Condition 2 from the PTOs was included as condition 2 of the requirements for permit units (S-1372-129-1, -132-2, -135-1).
- Condition 3 from the PTOs was included as condition 3 of the requirements for permit units (S-1372-129-1, -132-2, -135-1).
- Condition 4 from the PTOs was included as condition 4 of the requirements for permit units (S-1372-129-1, -132-2, -135-1).
- Condition 5 from the PTOs was included as condition 5 of the requirements for permit units (S-1372-129-1, -132-2, -135-1).
- Condition 6 from the PTOs was included as condition 6 of the requirements for permit units (S-1372-129-1, -132-2, -135-1).
- Condition 7 from the PTOs was included as condition 7 of the requirements for permit units (S-1372-129-1, -132-2, -135-1).
- Condition 8 from the PTOs was included as condition 8 of the requirements for permit units (S-1372-129-1, -132-2, -135-1).
- Condition 9 from the PTOs was included as condition 9 of the requirements for permit units (S-1372-129-1, -132-2, -135-1).
- Condition 10 from the PTOs was included as condition 41 of the requirements for permit units (S-1372-129-1, -132-2, -135-1).
- Condition 11 from the PTOs was included as condition 11 of the requirements for permit units (S-1372-129-1, -132-2, -135-1).
- Condition 12 from the PTOs was included as condition 12 of the requirements for permit units (S-1372-129-1, -132-2, -135-1).
- Condition 13 from the PTOs was included as condition 22 of the requirements for permit units (S-1372-129-1, -132-2, -135-1).

bbb. Water Disposal Tank (S-1372-130-2)

These permit units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements (S-1372-0-1). This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
 - Condition 2 from the PTO was included as condition 31 of the requirements for permit unit (S-1372-130-2).
 - Condition 3 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-130-2).
 - Condition 4 from the PTO was included as condition 2 of the requirements for permit unit (S-1372-130-2).
 - Condition 5 from the PTO was included as condition 3 of the requirements for permit unit (S-1372-130-2).
 - Condition 6 from the PTO was included as condition 4 of the requirements for permit unit (S-1372-130-2).
 - Condition 7 from the PTO was included as condition 5 of the requirements for permit unit (S-1372-130-2).
 - Condition 8 from the PTO was included as condition 6 of the requirements for permit unit (S-1372-130-2).
 - Condition 9 from the PTO was included as condition 7 of the requirements for permit unit (S-1372-130-2).
 - Condition 10 from the PTO was included as condition 8 of the requirements for permit unit (S-1372-130-2).
 - Condition 11 from the PTO was included as condition 9 of the requirements for permit unit (S-1372-130-2).
 - Condition 12 from the PTO was included as condition 10 of the requirements for permit unit (S-1372-130-2).
- ccc. Storage Tanks (S-1372-138-1, -153-1, -155-1, -156-1, -157-1, -158-1, -159-1, -209-1 through -227-1, -236-1, -237-1, -238-1, -239-1, -240-1, -246-1, through -273-1, -275-1, -276-1, -277-1, -278-1, -279-1, -280-1, -284-1, -285-1, -286-1, -287-1, -288-1, -289-1, -290-1, -291-1, -292-1, -293-1, -294-1, -295-1, -296-1, -313-1, -314-1, -315-1, -320-1, -321-1, -322-1, -325-1, -326-1, and -327-1)

These permit units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTO was included as condition 1 of the requirements for permit unit (S-1372-138-1, -153-1, -155-1, -156-1, -157-1, -158-1, -159-1, -209-1 through -227-1, -236-1, -237-1, -238-1, -239-1, -240-1, -246-1, through -273-1, -275-1, -276-1, -277-1, -278-1, -279-1, -280-1, -284-1, -285-1, -286-1, -287-1, -288-1, -289-1, -290-1, -291-1, -292-1, -293-1, -294-1, -295-1, -296-1, -313-1, -314-1, -315-1, -320-1, -321-1, -322-1, -325-1, -326-1, and -327-1)

ddd. Sump Tanks (1372-274-2 and -281-2)

These permit units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTO was not included as condition of the requirements for permit unit (1372-274-2 and -281-2). District Rule 4801 does not apply to fugitive sources of sulfur emissions.
- Condition 2 from the PTO was included as condition 1 of the requirements for permit unit (1372-274-2 and 281-2).
- Condition 3 from the PTO was included as condition 2 of the requirements for permit unit (1372-274-2 and 281-2).

eee. Fixed Roof Tanks (1372-331-1, -332-1, -335-1, -377-1, -338-1, -341-1, -342-1, -343-1, -344-1)

These permit units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTO was included as condition 1 of the requirements for these permit units.
- Condition 2 from the PTO was included as condition 6 of the requirements for these permit units.

fff. Fixed Roof Tanks (1372-347-1, -348-1, -360-1, -361-1, -362-1, -363-1, -364-1, 365-1)

These permit units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTO was not included as a separate condition because it is redundant with the statement at the bottom of these permit units.
- Condition 2 from the PTO was included as condition 6 of the requirements for these permit units.

ggg. Fixed Roof Tanks (1372-366-2, -367-2, -368-2)

These permit units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permits.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements (S-1372-0-1). This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the PTO was included as condition 1 of the requirements for these permit units.
- Condition 3 from the PTO was included as condition 2 of the requirements for these permit units.
- Condition 4 from the PTO was included as condition 3 of the requirements for these permit units.
- Condition 5 from the PTO was included as condition 5 of the requirements for these permit units.

hhh. 83.3 MMBtu/hr flare (S-1372-352-1)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 40 of the facility wide requirements (S-1372-0-1). This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the PTO was included as condition 1 of the requirements for these permit units.
- Condition 3 from the PTO was included in condition 2 of the requirements for these permit units.
- Condition 4 from the PTO was included as condition 3 of the requirements for these permit units.
- Condition 5 from the PTO was included as condition 4 of the requirements for these permit units.
- Condition 6 from the PTO was included as condition 5 of the requirements for these permit units.
- Condition 7 from the PTO was included as condition 6 of the requirements for these permit units.
- Condition 8 from the PTO was included as condition 7 of the requirements for these permit units.
- Condition 9 from the PTO was included as condition 8 of the requirements for these permit units.
- Condition 10 from the PTO was included as condition 9 of the requirements for these permit units.
- Condition 11 from the PTO was included as condition 10 of the requirements for these permit units.
- Condition 12 from the PTO was included as condition 11 of the requirements for these permit units.
- Condition 13 from the PTO was included as condition 12 of the requirements for these permit units.
- Condition 14 from the PTO was included as condition 13 of the requirements for these permit units.
- Condition 15 from the PTO was included as condition 14 of the requirements for these permit units.
- Condition 16 from the PTO was included as condition 9 of the facility wide requirements (S-1372-0-1).
- Condition 17 from the PTO was included as condition 20 of the requirements for these permit units.

iii. 83.3 MMBtu/hr flare (S-1372-353-1)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions

from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included in condition 40 of the facility wide requirements (S-1372-0-1). This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the PTO was included as condition 1 of the requirements for these permit units.
- Condition 3 from the PTO was included in condition 2 of the requirements for these permit units.
- Condition 4 from the PTO was included as condition 3 of the requirements for these permit units.
- Condition 5 from the PTO was included as condition 4 of the requirements for these permit units.
- Condition 6 from the PTO was included as condition 5 of the requirements for these permit units.
- Condition 7 from the PTO was included as condition 6 of the requirements for these permit units.
- Condition 8 from the PTO was included as condition 7 of the requirements for these permit units.
- Condition 9 from the PTO was included as condition 8 of the requirements for these permit units.
- Condition 10 from the PTO was included as condition 9 of the requirements for these permit units.
- Condition 11 from the PTO was included as condition 10 of the requirements for these permit units.
- Condition 12 from the PTO was included as condition 11 of the requirements for these permit units.
- Condition 13 from the PTO was included as condition 12 of the requirements for these permit units.
- Condition 14 from the PTO was included as condition 13 of the requirements for these permit units.
- Condition 15 from the PTO was included as condition 9 of the facility wide requirements (S-1372-0-1).
- Condition 16 from the PTO was included as condition 19 of the requirements for these permit units.

iii. Gasoline Transfer (S-1372-186-2)

This permit unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions

from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 1 of the requirements for this permit.
- Condition 2 from the PTO was included as condition 2 of the requirements for this permit.
- Condition 3 from the PTO was included as condition 3 of the requirements for this permit.
- Condition 4 from the PTO was included as condition 4 of the requirements for this permit.

2. District Rule 1081 Source Sampling (Amended December 16, 1993)

District Rule 1081 has been submitted to the EPA to replace Kern County Rule 108.1, which is SIP approved. District Rule 1081 is as stringent as Kern County Rule 108.1, as shown on Table 1.

Table 1 - Comparison of District Rule 1081 and Kern County Rule 108.1

REQUIREMENTS	1081 SVJUAPCD	108.1 KERN
Upon request of the APCO, the source shall provide info. and records to enable the APCO to determine when a representative sample can be taken.	✓	✓
The facility shall collect, have collected or allow the APCO to collect, a source sample	✓	✓
The source shall have District personnel present at a source test	✓	
The applicable test method, if not specified in the rule, shall be conducted in accordance with 40 CFR § 60, Appendix A	✓	
Test procedures: 1) arithmetic mean of three runs 2) a scheduled source test may not be discontinued solely due to the failure to meet the applicable standard(s), and 3) arithmetic mean of two runs is acceptable if circumstances beyond owner or operator control occurs.	✓	

Sections 3.0, 4.0, 5.0, 6.0, and 7.0 of Rule 1081 set forth requirements for sampling facilities, collection of samples, test methods, test procedures, and administrative requirements, respectively. These requirements are in the conditions of the following permit units:

Permit Unit	Condition
-1-18	7, 14, 18, 19, 20, 21, 22
-2-13	5,13,17,18,19,20,21
-4-10	5,14,18,19,20,21,22
-10-17	10,11,12,13,20
-13-18, -14-17	11,12,13,14,21

-16-19	15,16,17,18,25
-17-20	13,18,19,20,21,27
-18-20, -19-19, -20-19	9,14,15,16,17,23
-24-18	11,12,13,20
-26-8	11,12,13,14,20
-29-17	6,13,17,18,19,20,21,25
-30-18, -31-6, -32-16	13,14,15,16,23
-33-15	14,15,16,17,24
-34-15	11,12,13,14,21
-74-4	17
-76-12	19
-77-12	20
87-6	18
99-4	15
-100-6	13,20
-111-5	9,10,11,12,18
-112, -113	9,10,11,15,19
-126-11	19
-127-11	1,21,22,23,24
-139-1	4,15,16
-140-1 through -149-1, - 151-1, -152-1	3
150-1	6,7,8,9,13,
-186-2	3
-187-7	4,36,37
-188-6	4,38,39
-194-8	4,35
-308-4	2
-312-4	20
-316-2	15
-317-2, -318-3	10,11,12,13
-319-2	9,10,11,12
-334-3	19,20,24
-346-1	7
-352-1	8,11,12,13
-353-1	7,10,11,12
-355-2	7,12,14
-356-2	18, 19, 20, 23, 24
-357-2	12,13,16
-358-2	9,13,14,18
-359-2	8,12,13,17

3. District Rule 2520

District Rule 2520, 9.4.2 and 9.5.2 - Federally Mandated Operating Permits

Section 9.1 of the rule requires operational requirements and limitations to assure compliance with all applicable requirements.

Section 9.4.2 of the rule requires that periodic monitoring be performed if none is associated with a given emission limit to assure compliance.

Section 9.5.2 of the rule requires that records of all required monitoring data and support information be retained for a period of at least five years from the date of the monitoring sample, measurement, or report.

a. Steam Generators (S-1372-137)

Section 9.0 of the rule identifies permit content requirements for active permit units. The following permit unit has been identified as “dormant”, or not currently allowed to operate, by conditions on the Permit To Operate: S-1327-137. Since the unit can not legally operate, no further evaluation of the permit content for the above listed unit is required at this time. Permit condition 6 (-137) this unit assures that all Title V requirements will be addressed for each unit prior to operation.

b. Steam Generators (S-1372-1-18, 2-13, -4-10, -8-16, -26-8, -31-16, -112-6, -113-7, -127-11, -317-2, -318-3, -319-2, -334-3, -355-2, -356-2, -357-2, -358-2, and -359-2) and Heater Treaters (S-1372-139-1, 140-1, -141-1, -142-1, -143-1, -144-1, -145-2, -146-2, -149-1, -150-1, -151-1, and 152-1)

Periodic monitoring consisting of testing, recordkeeping, and sampling is supported by permit conditions listed in the table below of the requirements of permit units. These conditions also required the operator to retain copies of fuel invoices, and to test the sulfur content of the fuel content to show compliance with SO_x limitations.

c. Well Vents with flare (S-1372-74-4, 76-12, 77-12, -87-7, -99-3, -100-9, -126-10, -312-5, -316-2)

Testing and periodic monitoring of visible emissions is supported by the permit condition of the following permit units

listed below. This condition requires the operator to periodically monitor the visible emissions of the flare while in operation.

The operational, monitoring and recordkeeping requirements of Rule 2520 are in the conditions of the following permit units:

Permit Unit	Condition
-1-18, -4-10	24, 25, 26, 27, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40
-2-13	23, 24, 25, 26, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39
-10-17, -26-8	18, 19, 21, 22, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35
-13-18, -14-17	12, 13, 19, 20, 22, 23, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36
-16-19	16, 17, 23, 24, 26, 27, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40
-17-20	28, 29, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47
-18-20, -19-19, -20-19	24, 25, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43
-24-18	18, 19, 21, 22, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35
-29-17	23, 24, 26, 27, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40
-30-18, -31-16, -32-16	21, 22, 24, 25, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38
-8-16, -33-15	22, 23, 25, 26, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39
-34-15	19, 20, 22, 23, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36
-74-4	10, 11, 12, 13, 14, 19, 30, 31, 32, 33
-76-12	12, 13, 14, 15, 16, 21, 32, 33, 34, 35
-77-12, -100-6	15, 16, 17, 22, 33, 34, 35, 36
-87-6	13, 14, 15, 20, 31, 32, 33, 34
-93-2, -94-4, -96-3	7, 8, 9, 10
-95-3	6, 7, 8, 9
-99-4, -316-2	10, 11, 12, 17, 28, 29, 30, 31
-111-5	10, 11, 16, 17, 19, 20, 21, 23, 24, 25, 26, 27, 28, 29, 30, 31
-112-6, -113-7	8, 17, 18, 20, 21, 22, 24, 25, 26, 27, 28, 29, 30, 31, 32
-114-1, -115-1, -116-1, -117-1	5, 6, 7, 8
-126-11	14, 15, 16, 21, 32, 33, 34, 35
-127-11	2, 3, 5, 6, 7, 8, 9, 10, 11, 12, 22, 23, 29, 30, 31, 32, 33, 34
-128-2	12, 13, 14, 16, 17, 18, 24, 25, 26, 27, 28, 29, 30, 31

-129-2, -131-2, -132-1, -135-1	16, 17, 18, 19, 20, 21, 22, 28, 29, 30, 31, 32, 33, 34, 35, 36
-130-2	13, 14, 15, 16, 17, 18, 19, 25, 26, 27, 28, 29, 30, 31, 32, 33
-138-1, -153-1, -155-1 through -159-1, -209-1 through -227-1, -235-2, -236-1 through -240-1, -246-1 through -273-1, -275-1, -276-1, -277-1, -278-1, -279-1, -280-1, -281-2, -284-1 through -296-1, -313-1, -314-1, -315-1, -320-1, -321-1, -322-1, -325-1, -326-1, -327-1, -331-1, -332-1, -335-1, -337-1, -338-1, -341-1, -342-1, -343-1, -344-1, -347-1, -348-1, -360-1 through -365-1	2, 3, 4, 5
-140-1, -141-1, -142-1, -143-1, -144-1, -145-2, -146-2, -147-1, -148-1, -149-1, -151-1, -152-1	4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17
-150-1	7, 8, 14, 16, 17, 18, 19, 20, 22, 23, 24, 25, 26
-186-2	5, 10, 14, 15, 16, 19
-187-7, -188-6	12, 13, 15, 16, 17, 18
-194-8	12, 13, 15, 16, 17, 18, 40
-274-2	4, 5, 6, 7
-308-4	5, 7, 8, 9
-312-4	15, 16, 17, 22, 33, 34, 35, 36
-317-2, -318-3	17, 18, 19, 20, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33
-319-2	16, 17, 18, 19, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32
-334-3	22, 23, 25, 26, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 41, 42, 43, 44
-346-1	9, 20, 21, 22, 23
-352-1	15, 16, 17, 18, 19
-353-1	14, 15, 16, 17, 18
-355-2	14, 15, 16, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29
-356-2	22, 23, 25, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43
-358-2, -359-2	15, 16, 18, 19, 21, 23, through 32
-357-2	14, 15, 17, 18, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31
-366-2, -367-2, -368-2	4, 5, 6, 7

4. District Rule 4201 – Particulate Matter Concentration

EPA issued a relative stringency finding, dated August 20, 1996, stating that District Rule 4201 is more stringent than SIP approved Kern County Rule 404. Section 3.1 of District Rule 4201 requires emissions to be at or below 0.1 grains of particulate matter per dry standard cubic foot of exhaust gas.

- a. Steam Generators (S-1372-1-18, 2-13, -4-10, -8-16, -26-8, -31-16, -112-6, -113-7, -127-11, -317-2, -318-3, -319-2, -334-3, -355-2, -356-2, -357-2, -358-2, and -359-2) and Heater Treaters (S-1372-139-1, 140-1, -141-1, -142-1, -143-1, -144-1, -145-2, -146-2, -149-1, -150-1, -151-1, and 152-1)

These units fire natural gas or vapor control system gas. The expected concentration of PM emitted from a natural gas fired steam generator is shown by the following analysis:

$$\left(\frac{13.7 \text{ lb PM}}{10^6 \text{ cf}} \right) \left(\frac{1 \text{ scf}}{900 \text{ Btu}} \right) \left(\frac{100 \text{ MMBtu}}{\text{hr}} \right) = \left(\frac{1.52 \text{ lb PM}}{\text{hr}} \right) < \left(\frac{10 \text{ lb PM}}{\text{hr}} \right)$$

$$\left(\frac{13.7 \text{ lb PM}}{10^6 \text{ ft}^3} \right) \left(\frac{1 \text{ scf}}{900 \text{ Btu}} \right) \left(\frac{1 \text{ MMBtu}}{8710 \text{ dscf}} \right) \left(\frac{7000 \text{ grain}}{1 \text{ lb}} \right) = \left(\frac{0.01 \text{ grain}}{\text{dscf}} \right) < \left(\frac{0.1 \text{ grain}}{\text{dscf}} \right)$$

where:

$\frac{13.7 \text{ lb PM}}{10^6 \text{ cf}}$ = sum of filterable and condensable uncontrolled emission factors for natural gas-fired boilers (AP42, Table 1.4-2)

$\frac{900 \text{ Btu}}{1 \text{ scf}}$ = the minimum expected higher heating value of natural gas (AP42, Table 1.4.1)

$\frac{100 \text{ MMBtu}}{\text{hr}}$ = maximum heat input this template

$\frac{8710 \text{ dscf}}{1 \text{ MMBtu}}$ = F factor, Fd, for natural gas at 0% O₂ (40CFR60, App. A, Table 19-1)

$\frac{10,610 \text{ wscf}}{1 \text{ MMBtu}}$ = F factor, Fw, for natural gas at 0% O₂ (40CFR60, App. A, Table 19-1)

$\frac{7000 \text{ grain}}{1 \text{ lb}}$ = conversion factor (AP42, Appendix A)

The only constituents found in non-regulated gas streams that contribute to the formation of PM are sulfur and, occasionally, trace amounts of metals. Any metals present in the gas stream are removed during the free water knockout stage in the condenser at the compressor. The results of source tests on units operating on combined waste gas and natural gas show PM levels far below allowable levels (actual source tests are on file with the District). Based on these source test results and the preceding compliance

analysis, compliance with applicable PM limits is assured without the need for PM testing.

DIESEL FUEL OIL UNITS

For diesel fired units, the 12% CO₂ correction required by District Rule 4301 in the exhaust stream occurs at 4% O₂. A more conservative analysis is obtained by calculating emissions at 0% O₂ and thus, the following compliance analysis uses F-factors uncorrected from 0% O₂.

$$\left(\frac{2 \text{ lb PM}}{10^3 \text{ gal}}\right)\left(\frac{1 \text{ gal}}{137,000 \text{ Btu}}\right)\left(\frac{100 \text{ MMBtu}}{\text{hr}}\right) = 1.5 \frac{\text{lb PM}}{\text{hr}} < 10 \frac{\text{lb PM}}{\text{hr}}$$

$$\left(\frac{2 \text{ lb PM}}{10^3 \text{ gal}}\right)\left(\frac{1 \text{ gal}}{137,000 \text{ Btu}}\right)\left(\frac{1 \text{ MMBtu}}{9190 \text{ dscf}}\right)\left(\frac{7000 \text{ gr}}{1 \text{ lb}}\right) = \left(\frac{0.01 \text{ grain}}{\text{dscf}}\right) < \left(\frac{0.1 \text{ grain}}{\text{dscf}}\right)$$

where:

$\frac{2 \text{ lb PM}}{10^3 \text{ gal}}$ = the emission factor for filterable PM, No. 2 fuel oil, (AP-42, Table 1.3-2)

$\frac{137,000 \text{ Btu}}{1 \text{ gal diesel}}$ = heating value (AP-42, Appendix A)

$\frac{9190 \text{ dscf}}{\text{MMBtu}}$ = F factor, F_d, for oil (40CFR60, App. A, Meth. 19, Table 19-1)

$\frac{10,320 \text{ wscf}}{\text{MMBtu}}$ = F factor, F_w, for oil (40CFR60, App. A, Meth. 19, Table 19-1)

The preceding calculations demonstrate that the emissions of PM are expected to be well below applicable limits. Compliance with these limits is expected for even the largest units covered by this template and, therefore, no testing, recordkeeping, reporting, or monitoring will be required for these units.

RESIDUAL OIL FIRED(INCLUDING CRUDE OR TOPPED CRUDE)

Compliance with PM limits will be assured by template permit conditions that require source testing when firing on residual oil (including crude or topped-crude). The operator is required to record daily amount of all fuels combusted, the dates on which firing on any fuel other than certified gaseous or diesel fuel has occurred, as well as the type of non-certified fuel fired. If a unit is fired on residual oil at any time during a calendar year, the operator is required by to show compliance with the PM emission limits by source testing the unit during such firing and within 60 days of said firing.

5. Kern County Rule 424

Kern County Rule 424 limits sulfur emissions to 0.11 lb sulfur per million BTUs of heat input. Section D of this rule states the operator may satisfy this emission limit by demonstrating the total emissions of sulfur compounds from all of steam generators located at the stationary source with an ATC or PTO issued prior to September 12, 1979, do not exceed the total emissions of sulfur compounds from these generators which would result if all such units were operating in compliance with this emission limit. For PUC regulated natural gas the maximum sulfur content is 0.0068 lb sulfur per million BTU (assuming a higher heating value of 0.00105 MMBtu per standard cubic foot). For FERC regulated gas, the maximum sulfur content is even lower (0.00102 lb sulfur per million BTU). Therefore compliance is expected for these fuels.

In order to demonstrate compliance with this requirement for other fuels, the operator must determine the sulfur emissions and heat input from fuel certification, fuel testing, or source testing in combination with routine fuel analysis.

6. District Rule 4301 - Fuel Burning Equipment

Section 5.1 requires PM emissions to be limited to 0.1 grain per cubic foot of gas calculated to 12% carbon dioxide at dry standard conditions.

Section 5.2.1 limits emissions to 200 lb/hr of sulfur compounds, calculated as SO₂.

Section 5.2.2 limits the emission of NO_x to 140 lb/hr (calculated as NO₂).

These requirements were addressed in the conditions of the following permit units:

Permit Unit	Condition
-1-18	28,29,36
-2-13	27,28,35
-4-10	28,29,36
-31-6, -356-2	26,27,34
-112	22,23,24
-113	22,23,24
-127-11	4,5,12

-139-1	7,8,9
-140-1	6,7,8
-141-1 through -149-1	6,7,13
-150-1	15,16
-151-1	6,7,13
-152-1	6,7,13
-317-2, -318-3	21,22,29
-319-2	20,21,28
-334-3	27,28,35
-355-2	17,18,25
-358-2, 359-2	21,22,29
-357-2	19, 20, 27

The following analysis demonstrates that compliance is expected:

a. Gas Fired Steam Generators

Section 5.2.1 of District Rule 4301 limits the emission of SO_x to 200 lb/hr (calculated as SO_2).

The units are permitted to be fired on natural gas or vapor control system gas. The following equation, using AP42 emission factors for natural gas and assuming the largest of the steam generators (62.5 MMBtu/hr) using the highest permitted emission factor (0.093 lb/MMBtu), demonstrate that the emission of SO_x for the units is expected to comply with the limit of this rule.

$$(62.5 \text{ MMBtu/hr})(0.093 \text{ lb/MMBtu}) = 5.81 \text{ lb/hr} \ll 200 \text{ lb/hr}$$

Section 5.2.2 of District Rule 4301 limits the emission of NO_x to 140 lb/hr (calculated as NO_2).

The units are permitted to be fired on natural gas or vapor control system gas. The following equation, using AP42 emission factors for natural gas and assuming the largest of the steam generators (62.5 MMBtu/hr), demonstrate that the emission of NO_x for the units is expected to comply with the limit of this rule.

$$\left(\frac{140 \frac{\text{lb} \cdot \text{NO}_x}{10^6 \cdot \text{ft}^3}}{0.00105 \frac{\text{MMBtu}}{\text{ft}^3}} \right) \left(62.5 \frac{\text{MMBtu}}{\text{hr}} \right) = 8.3 \frac{\text{lb} \cdot \text{NO}_x}{\text{hr}} \ll 140 \text{ lb/hr}$$

$$140 \frac{lb \cdot NO_x}{10^6 \cdot ft^3} = \text{uncontrolled } NO_x \text{ emission factor for gas fired boilers (AP42, Table 1.4-2)}$$

$$0.00105 \frac{MMBtu}{ft^3} = 1050 \frac{Btu}{ft^3} = \text{heating value for natural gas (AP42, Table 1.4-2)}$$

Section 5.2.3 of District Rule 4301 limits the emission of PM to 10 lb/hr.

The units are permitted to be fired on natural gas or vapor control system gas. The following equation, using AP42 emission factors for natural gas and assuming the largest of the steam generators (62.5 MMBtu/hr), demonstrate that the emission of PM for the units is expected to comply with the limit of this rule.

$$\left(\frac{13.7 \text{ lb PM}}{10^6 \text{ cf}} \right) \left(\frac{1 \text{ scf}}{900 \text{ Btu}} \right) \left(\frac{62.5 \text{ MMBtu}}{\text{hr}} \right) = \left(\frac{1 \text{ lb PM}}{\text{hr}} \right) \ll \left(\frac{10 \text{ lb PM}}{\text{hr}} \right)$$

where:

$$13.7 \frac{\text{lb PM}}{10^6 \text{ cf}} = \text{sum of filterable and condensable uncontrolled emission factors for natural gas-fired boilers (AP42, Table 1.4-2)}$$

$$\frac{900 \text{ Btu}}{1 \text{ scf}} = \text{the minimum expected higher heating value of natural gas (AP42, Table 1.4.1)}$$

USING CERTIFIED DIESEL FUEL

Diesel-fired units qualifying to use this template are limited to the combustion of distillate fuel with a sulfur content less than 0.5%. The following demonstration illustrates, by solving for fuel sulfur content at the Rule 4301 emission limit, that the proposed limitation is more stringent than District Rule 4301, 5.2.1.

$$\frac{\left(100 \frac{\text{lb} \cdot \text{S}}{\text{hr}} \right) \left(\frac{0.137 \text{ MMBtu}}{1 \text{ gallon fuel oil}} \right)}{\left(\frac{7.05 \text{ lb fuel oil}}{1 \text{ gallon fuel oil}} \right) \left(100 \frac{\text{MMBtu}}{\text{hr}} \right)} = \frac{0.019 \text{ lb S}}{\text{lb fuel oil}} \cong 2\% \text{ weight sulfur content}$$

where:

$$\left(100 \frac{\text{lb} \cdot \text{S}}{\text{hr}}\right) = \left(200 \frac{\text{lb} \cdot \text{SO}_x}{\text{hr}}\right) = \text{District Rule 4301, 5.2.1 emission}$$

$$\left(\frac{7.05 \text{ lb fuel oil}}{1 \text{ gallon fuel oil}}\right) \text{ the density of distillate oil (AP-42 Appendix A)}$$

$$\left(100 \frac{\text{MMBtu}}{\text{hr}}\right) = \text{maximum rated heat input for this template}$$

$$\left(\frac{0.137 \text{ MMBtu}}{1 \text{ gallon fuel oil}}\right) = \text{higher heating value of distillate oil (AP-42 Appendix A)}$$

The preceding analysis shows that the allowable fuel sulfur content at District Rule 4301 maximum emission limit and at the maximum heat input of this template, is 2% weight sulfur content. This demonstrates that the proposed fuel sulfur limit, 0.5% by weight sulfur content, is clearly more stringent.

USING NONCERTIFIED FUELS

If the operator chooses to demonstrate compliance by fuel analysis of noncertified fuels, compliance shall be determined by multiplying the sulfur content of the fuel in lb/MMBtu by the maximum hourly heat input rating of the unit in MMBtu/hr, and comparing the result to the 100 lb sulfur per hour limit. Alternatively the operator may choose to source test to determine control efficiency and perform routine fuel analysis to determine uncontrolled emissions.

7. District Rule 4401 – Steam Enhanced Crude Oil Production Well Vents

District Rule 4401 (amended January 15, 1998) is a renumbering of the requirements of SIP approved District Rule 465.1.

Section 4.5.1 requires any exempt well to be located more than 1000 feet from an existing well vent vapor control system operated by the company.

Section 5.0 sets forth requirements for limiting the emissions of Volatile Organic Compounds (VOCs). This section lists emission control requirements as well as work practice standards.

Section 6.0 sets forth requirements for testing and record keeping. This section also allows the APCO to waive certain control systems from the requirements of section 6.2.1.

This waiver applies to control systems consisting of fuel burning equipment or smokeless flares, and systems which do not have VOC emissions (specifically, if VOC collected is re-injected underground). The basis of the waiver for smokeless open flares is that technology does not currently exist for source testing these controls. However, typically these devices have 99% or greater control efficiency. The basis of the waiver for control systems which re-inject VOCs underground is that these systems are assumed to have 100% control. This VOC disposal method does not use an emission destruction device and there is no need to conduct a source test. The basis of the waiver for control systems consisting of fuel burning equipment (primarily steam generators) is that these units have greater than 99% control efficiency for VOC, as demonstrated by the following calculations:

STEAM GENERATORS, > 100 MMBtu/hr:

$$\left(\frac{1.4 \frac{lb \cdot VOC}{10^6 \cdot cf}}{\frac{1 \cdot lb}{23.8cf}} \right) = 0.000033 \frac{lb \cdot VOC}{lb \cdot gas} = 0.0033\%$$

STEAM GENERATORS, < 100 MMBtu/hr:

$$\left(\frac{2.8 \frac{lb \cdot VOC}{10^6 \cdot cf}}{\frac{1 \cdot lb}{23.8cf}} \right) = 0.000067 \frac{lb \cdot VOC}{lb \cdot gas} = 0.0067\%$$

where:

$1.4 \frac{lb \cdot VOC}{10^6 \cdot cf}$ = TOC emission factor (excluding methane), natural gas fired boilers
 >100 MMBtu/hr
 (AP-42, Table 1.4-3)

$2.8 \frac{lb \cdot VOC}{10^6 \cdot cf}$ = TOC emission factor (excluding methane), natural gas fired boilers
 <100 MMBtu/hr
 (AP-42, Table 1.4-3)

$\frac{1 \cdot lb}{23.8cf}$ = density of natural gas, (AP-42, Appendix A)

The preceding calculations demonstrate that the control efficiency for VOC emissions is greater than 99% by two orders of magnitude for

steam generators. Therefore, source tests for VOC control effectiveness are clearly unnecessary.

Section 6.2.1 requires annual source testing to show control efficiency compliance.

Control systems which have been waived from the source test requirements of District Rule 6.2.1 are still required to demonstrate compliance with sections 5.1 and 5.2 of the rule for 99% control of collection and control efficiency. There are no general conditions addressing compliance with these sections for such equipment. Consequently, a one-time demonstration of collection efficiency using a mass balance and source specific data will be necessary for such sources. In the Title V application (except by the use of templates) the source must also demonstrate compliance with the requirement that collection and control system have 99% control efficiency.

The requirements of Rule 4401 were addressed in the following permit conditions:

Permit Unit	Condition
-74-4	16,18,20 through 30
-76-12	1,18,20,22 through 32
-77-12	1,19,21,23 through 33
-87-6	1,17,19,21 through 31
-99-4	1,14,16,18 through 28
-100-6	3,19,21,23 through 33
-126-11	1,18,20,22 through 32
-308-4	4
-312-4	9,19,21,23 through 33
-316-2	4,5,14,16,18,19 through 28
-346-1	4,6,8,10 through 20

8. District Rule 4402 – Crude Oil Production Sumps

District Rule 4402 limits fugitive VOC emissions from qualifying components by providing monitoring, record keeping and reporting requirements.

Section 5.0 sets forth requirements for limiting the emissions of Volatile Organic Compounds (VOCs). This section lists emission control requirements as well as work practice standards.

The requirements of this rule were included in the conditions of the following permit units:

Permit Unit	Condition
-274-2	2
-281-2	2

9. District Rule 4621 – Gasoline Transfer Into Stationary Storage Containers, Delivery Vessels, and Bulk Plants

This rule requires that gasoline storage tanks be equipped with an ARB-certified Phase I vapor recovery system and that the vapor recovery system be maintained and operated according to manufacturer's specifications. The rule further requires that no delivery vessel be allowed to operate unless valid state decals are displayed. Aboveground storage tanks must be equipped with a pressure-vacuum valve set to within 10% of the maximum allowable working pressure of the tank.

The requirements of Rule 4621 were addressed in the following permit conditions:

Permit Unit	Condition
-186-2	1, 4, 6, 7, 8

10. District Rule 4622 – Gasoline Transfer Into Motor Vehicle Fuel Tanks

This rule requires that gasoline storage and dispensing facilities be equipped with an ARB-certified Phase II vapor recovery system and that the vapor recovery system be source tested and maintained in good working order. In the event that specific system defects are found, the rule requires that the defective component be tagged "Out of Order" and shut down until the defect has been repaired. The system cannot be tampered with in any way that affects effectiveness or operation nor can an ARB certified system be removed once installed. Topping off a motor vehicle fuel tank is prohibited. The rule also contains requirements applicable to retail service stations only which require a prominent display of operating instructions along with the posting of a toll-free telephone number to report complaints and hold-open latches on dispensing nozzles.

The requirements of Rule 4622 were addressed in the following permit conditions:

Permit Unit	Condition
-186-2	2, 4, 9, 10, 11, 12, 13, 14, 15, 17, 18,

11. District Rule 4623 (adopted April 11, 1991, amended September 19, 1991, Amended December 17, 1992) is a renumbering of the requirements of SIP approved District Rule 463.2.

This rule applies to equipment used to store organic liquids with a true vapor pressure of greater than 1.5 psia, pursuant to section 2.0, Applicability. Requirements from section 5.0 apply only to floating or fixed roof organic liquid storage tanks with capacity of 19,800 gallons or greater and to gasoline storage tanks with 19,800 gallons or less capacity.

District Rule 4623 has been submitted to the EPA to replace the old, SIP approved, District Rule 463.2. Appendix B of Template SJV-TK-13-0 lists all of the applicable requirements of District Rule 4623 and shows which are included in the rule from the old, SIP approved, rule. This table shows that District Rule 4623 is as stringent as rule 463.2, thus rule 463.2 will be subsumed by rule 4623.

Section 2.0 states that this rule is only applicable to equipment used to store organic liquids, including crude oil and petroleum distillates, with a true vapor pressure of greater than 1.5 psia.

This rule requires that all tanks with a storage capacity greater than 19,800 gallons, storing organic liquids with a true vapor pressure greater than or equal to 1.5 psia, have either a floating roof or vapor recovery system to control volatile organic compound (VOC) emissions.

Section 3.7 defines the term "organic liquid" as "any liquid which contains VOCs and has a True Vapor Pressure (TVP) greater than 1.5 psia at actual storage conditions."

Section 5.3.1 requires that any fixed roof tank with a storage capacity of 19,800 gallons or larger used to store any organic liquid, light crude oil or petroleum distillate with a true vapor pressure greater than 1.5 psia be equipped with a vapor loss prevention system capable of collecting all VOCs. These units also are required to contain a system for processing and for return to liquid storage or disposal of VOCs, so as to prevent their emission to the atmosphere at an efficiency of at least 95 percent by weight.

Section 5.3.2 requires that any tank gauging or sampling device on a tank vented to the vapor recovery system be equipped with a gas-tight cover. This cover shall be closed at all times except during gauging or sampling.

Section 5.3.3 requires that all piping, valves and fittings be constructed and maintained in a gas tight condition

- a. Storage Tanks (permit units S-1372-93-2, -94-4, -95-3, -96-3, -138-1, -153-1, -155-1, -156-1, -157-1, -158-1, -159-1, -209-1, -210-1, -211-1, -212-1, -213-1, -214-1, -215-1, -216-1, -217-1, -219-1, -220-1, -221-1, -222-1, -223-1, -224-1, -225-1, -226-1, -227-1, -235-2, -236-1, -237-1, -238-1, -239-1, -240-1, -244-1, -246-1, -247-1, -248-1, -249-1, -250-1, -251-1, -252-1, -253-1, -254-1, -255-1, -258-1, -259-1, -260-1, -261-1, -262-1, -263-1, -264-1, -265-1, -266-1, -267-1, -268-1, -269-1, -270-1, -271-1, -272-1, -273-1, -275-1, -276-1, -277-1, -278-1, -279-1, -280-1, -284-1, -285-1, -286-1, -287-1, -288-1, -289-1, -290-1, -291-1, -292-1, -293-1, -294-1, -295-1, -296-1, -313-1, -314-1, -315-1, -320-1, -321-1, -322-1, -325-1, -326-1, -327-1, -331-1, -332-1, -335-1, -337-1, -338-1, -341-1, -342-1, -343-1, -344-1, -347-1, -348-1, -360-1, -361-1, -362-1, -363-1, -364-1, 365-1, -366-2, -367-2, -368-2)

These fixed roof organic liquid storage tanks each have a storage capacity of greater than 19,800 gallons but are exempted from the requirements of Rule 4623 since they are used to store liquid petroleum with the true vapor pressure less than 1.5 psia, as required on the permit to operate. However, to maintain exemption status, the operator shall keep the record of true vapor pressures to demonstrate that the tanks are having $TVP < 1.5$ and shall not subject to the requirement of section 5.0 of District Rule 4623. Conditions were added that contain monitoring and testing requirements to assure the exemption status is maintained

- b. Tanks with Vapor Recovery System(S-1372-128-2, -129-2, -130-2, -131-2, 134-2, 135-2)

The requirements of Rule 4623 were addressed in the following conditions for these permit units:

Permit Unit	Condition
-128-2	12,13,21,22,23,24,25,30
-129-2	1,12,13,14,15,23,24,25,26,27
-130-2	12,13,21,22,23,24,25
-131-2	1,12,13,14,15,23, 24,25,26,27,33
-132-2	1,12,13,14,15,23,24,25,26,27,33
-135-2	1,12,13,14,15,23,24,25,26,27,33

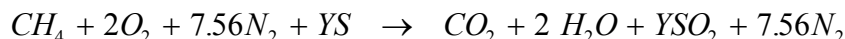
12. District Rule 4801 – Sulfur Compounds

Table 2 - Comparison of District Rule 4801 and Kern County Rule 407

REQUIREMENTS	4801 District	407 Kern
a person shall not discharge into the atmosphere sulfur compounds exceeding in concentration at the point of discharge 0.2 percent by volume calculated as sulfur dioxide on a dry basis averaged over 15 consecutive minutes.	✓	✓
EPA Method 8 and ARB Method 1-100 shall be used to determine such emissions.	✓	

- a. Steam Generators (S-1372-1-18, 2-13, -4-10, -8-16, -26-8, -31-16, -112-6, -113-7, -127-11, -317-2, -318-3, -319-2, -334-3, -355-2, -356-2, -357-2, -358-2, and -359-2) and Heater Treaters (S-1372-139-1, 140-1, -141-1, -142-1, -143-1, -144-1, -145-2, -146-2, -149-1, -150-1, -151-1, and 152-1)

Assuming that 0% excess air in the exhaust stream corresponds with maximum SO_x emissions concentration (neglecting NO_x and SO_x relative to SO₂ in the exhaust) and that CH₄ represents a typical gaseous fuel, the combustion equation for natural gas is:



where:

Y = moles of sulfur in the fuel.

Solving the expression for the fraction of SO₂ in the dry exhaust by volume gives:

$$\frac{Y}{1 + 7.56} = 0.002 \Rightarrow Y = 0.01712$$

where:

Y = mole fraction of S per mole of CH₄ combusted

1 = one mole of CO₂

7.56 = number of moles of N₂

0.002 = 0.2% by volume = 2000 ppmv limit per District Rule 4801

Use Y to calculate the weight fraction of S in one mole of CH₄:

$$\frac{(0.01712)(32.06)}{(16.04) + (0.01712)(32.06)} = 0.033 \Rightarrow 3.3\% \text{ S by weight in the fuel.}$$

where:

32.06 = molecular weight of sulfur (S)

16.04 = molecular weight of methane (CH₄)

0.033 = fraction of S by weight in the fuel

This equation shows that an exhaust concentration of 0.2% by volume corresponds to a gaseous fuel sulfur content by weight of about 3.3%. Natural gas burned in this unit is expected to contain much less than 3.3% sulfur. The units are all required to be fired on PUC quality natural gas or vapor control system gas only, assuring compliance with the standard.

Further monitoring, recordkeeping or reporting will be necessary and is required for each of these permit units. The units are required to either perform fuel sampling or fire only documented PUC gas.

13. 40 CFR 60, Subpart K Standards of Performance for Storage Vessels for Petroleum Liquids

All the storage vessels for petroleum liquids located at Nuevo Energy Company's Western Heavy Oil Field are not subject to the requirement of these Subparts. Per affected facility definition, it does not include "storage vessel for petroleum liquids or condensate stored, processed, and/or treated at a drilling and production facility prior to custody transfer". All petroleum liquid storage tanks at this facility are exempted from the requirements of 40 CFR 60 Subpart K, Subpart Ka, and Subpart Kb since these tanks store crude oil and petroleum liquids in production oil fields prior to custody transfer.

14. 40 CFR 63, Subpart HH National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities

The rule only applies to facilities in oil and natural gas (ONG) production. For the purposes of the rule, oil production is defined as hydrocarbon liquids production from the wellhead to the point of custody transfer (i.e., the sales point). Gas production is defined as from the wellhead up to and including the gas processing plant; after the processing plant, the natural gas is considered to be in the transmission and storage (T&S) category. If no processing plant is present, then the gas enters the T&S category after lease custody transfer. The ONG standards apply to facilities that major sources of HAPs and require controls on certain glycol dehydrators, storage vessels with flashing losses, and equipment leaks that exceed certain criteria such as throughputs, composition, or emissions.

This facility exclusively processes black oil, which is defined as API gravity less than 40 and initial gas-to-oil ratio (GOR) less than 1,750 scf/bbl. (Initial GOR is defined as the producing GOR during the period when the reservoir pressure is above the bubble point pressure). Therefore, this facility is not subject to the requirements of this subpart.

15. 40 CFR Part 68 Chemical Accident Prevention Provisions

The requirements of this provision mandate that subject facilities submit a Risk Management Plan to the proper authority. Condition 41 of the facility wide requirements (S-1372-0) requires compliance with this provision.

X. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered to be in compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements Addressed by Model General Permit Templates

By using the model general permit templates listed in Section IV of this evaluation, the applicant has requested that a permit shield be issued for requirements addressed in the templates. The basis for each permit shield is discussed in the Permit Shield section of each template.

B. Requirements not Addressed by Model General Permit Templates

The applicant is requesting a permit shield for each of the requirements listed below:

a. District Rule 4401; and County Rules 108, 108.1, and 110

The applicant is requesting a permit shield from requirements of District Rule 4401, excluding sections 5.1 and 5.2, for control systems which have been waived from complying with the requirement of section 6.2.1 and of County Rules 108, 108.1, and 110. A permit shield is granted from these requirements under permit number and conditions: -74-4, 31&32; -76-12, 33&34; -77-12, 34&35; -87-6, 32&33; -99-4, 29&30; -100-6, 34&35; -126-11, 33&34; -308-4, 7&8; -312-4, 35&36; -316-2, 29&30; -346-1, 21&22.

b. District Rules 4621, 4622, and 4623, section 5.4

Permit shields are requested for District Rules 4403 and 4624 and County Rule 412.1 (Kern), 413 (Kern). Facilities to which these rules are applicable are specifically excluded by template qualification conditions. That is, qualifying units are not equipment used for light

crude oil and gas production, natural gas processing, nor organic liquid loading. A permit shield is granted for these rules, and the corresponding county rules referenced above. District Rule 4623, except section 5.4, applies only to internal or external floating roof tanks with capacity of 19,800 gallons or more, which are excluded from using this template in the Template Qualification Form. Therefore, these requirements are not applicable to any unit using this template. A permit shield is granted from these requirements in S-1372-186-2.

A permit shield will be granted for 40 CFR 60 Subpart XX because facilities qualifying to use this template are limited to those which are not bulk gasoline terminals.¹ Pursuant to 40 CFR 60.500(a), Applicability, the affected facility is the total of all the loading racks at a bulk gasoline terminal which deliver liquid product into gasoline tank trucks. Units of qualifying to use this template are not loading racks and would have to be modified significantly, which would require a new permit, to perform as such. A permit shield is granted from these requirements.

c. District Rule 4407

A permit shield will also be granted for District Rule 4407 because units qualifying to use this template are not in situ combustion well vents. Added conditions insures units using this template will not operate in a manner which would trigger District Rule 4407 applicability. A permit shield is granted from under requirement with permit number and condition: -74-4, 33; -76-12, 35; -77-12, 36; -87-6, 34; -99-4, 31; -100-6, 36; -126-11, 35; -308-4, 9; -312-4, 37; -316-2, 31; -346-1, 23

d. District Rule 4623, 40CFR 60 Subpart K, Ka and Kb, and District Rule 4801

A permit shield will also be granted for 4623 because as explained in section IX.B.11.a. are exempted from the requirements of Rule 4623 since they are used to store liquid petroleum with the true vapor pressure less than 1.5 psia, as required on the permit to operate.

A permit shield will also be granted for 40CFR 60 Subpart K, Ka and Kb because units qualifying to use this template have a storage capacity less than 420,000 gallons and are used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. These rules only apply to units that are not used for petroleum or condensate stored, processed

¹ As defined in 40CFR§60.501 See Appendix A.

and/or treated at a drilling and production facility prior to custody transfer..

A permit shield will also be granted for District Rule 4801. This rule specifies testing requirements for a stack source. Tank emissions are fugitive emissions not considered to come from a point source. Therefore, this rule does not apply to units covered by this template.

A permit shield is granted from these requirements in permits S-1372-93-2, -94-4, -95-3, -96-3, -138-1, -153-1, -155-1, -156-1, -157-1, -158-1, -159-1, -209-1, -210-1, -211-1, -212-1, -213-1, -214-1, -215-1, -216-1, -217-1, -219-1, -220-1, -221-1, -222-1, -223-1, -224-1, -225-1, -226-1, -227-1, -235-2, -236-1, -237-1, -238-1, -239-1, -240-1, -244-1, -246-1, -247-1, -248-1, -249-1, -250-1, -251-1, -252-1, -253-1, -254-1, -255-1, -258-1, -259-1, -260-1, -261-1, -262-1, -263-1, -264-1, -265-1, -266-1, -267-1, -268-1, -269-1, -270-1, -271-1, -272-1, -273-1, -275-1, -276-1, -277-1, -278-1, -279-1, -280-1, -284-1, -285-1, -286-1, -287-1, -288-1, -289-1, -290-1, -291-1, -292-1, -293-1, -294-1, -295-1, -296-1, -313-1, -314-1, -315-1, -320-1, -321-1, -322-1, -325-1, -326-1, -327-1, -331-1, -332-1, -335-1, -337-1, -338-1, -341-1, -342-1, -343-1, -344-1, -347-1, -348-1, -360-1, -361-1, -362-1, -363-1, -364-1, -365-1, -366-2, -367-2, -368-2.

XI. PERMIT CONDITIONS

See final Title V permit conditions beginning on the following page.

ATTACHMENT A - DETAILED FACILITY PRINTOUT

**ATTACHMENT B - INSIGNIFICANT ACTIVITIES OR
EQUIPMENT**

The following exempt equipment was identified by the applicant on TVFORM-003, Insignificant Activities.

Exemption Category	Rule 2020 Citation	
Structure or incinerator associated with a structure designed as a dwelling for 4 families or less.	4.2.3	
Use of less than 2 gal/day of graphic arts materials.	5.4	
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less.	5.1.1	✓
Piston-type internal combustion engine with maximum continuous rating of 50 braking horsepower (bhp) or less.	5.1.2	✓
Gas turbine engines with maximum heat input rating of 3 MMBtu/hr or less.	5.1.3	
Space heating equipment other than boilers.	5.1.4	✓
Locomotives, airplanes, and watercraft used to transport passengers or freight.	5.2	
Cooling towers with a circulation rate less than 10,000 gal/min.	5.3	✓
Equipment at retail establishments used to prepare food for human consumption.	5.5.1	
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by Section 5.1.1.	5.5.2	
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plasticizer or blowing agent is used.	5.6	
Containers used to store clean produced water.	5.7.1	✓
Containers ≤ 100 bbl used to store oil with specific gravity ≥ 0.8762 .	5.7.2	✓
Containers ≤ 100 bbl installed prior to 6/1/89 used to store oil with specific gravity ≥ 0.8762 .	5.7.3	✓
Brazing, soldering, or welding equipment.	5.10.1	✓
Fugitive emissions sources associated with exempt equipment.	5.10.3	✓
Equipment used to compress natural gas.	5.10.2	
Containers with a capacity ≤ 250 gallons used to store organic material where the actual storage temperature < 50 F.	5.7.4	✓
Containers used to store unheated organic material with an initial boiling point ≥ 302 F.	5.7.5	✓
Containers used to store fuel oils or non-air-blown asphalt with specific gravity $\geq .9042$.	5.7.6	✓
Containers used to store petroleum distillates used as motor fuel with specific gravity ≥ 0.8251 .	5.7.7	✓
Containers used to store refined lubricating oils.	5.7.8	✓

Exemption Category	<i>Rule 2020 Citation</i>	
Unvented pressure vessels used exclusively to store liquefied gases or associated with exempt equipment.	5.7.9 or 5.10.4	✓
Portable tanks used exclusively to store produced fluids for ≤ six months.	5.7.10	✓
Mobile transport tanks on vehicles for delivery of VOCs.	5.7.11	
Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point ≥ 302 F or of fuel oil with specific gravity ≥ 0.8251.	5.8.1.1	
Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity ≥ 0.8762.	5.8.1.2	✓
Equipment used to apply architectural coatings.	5.9.1	✓
Equipment used exclusively for the transfer of refined lubricating oil.	5.8.2	
Unheated, non-conveyorized degreasers < 10 ft ² open area; using solvents with initial boiling point ≥ 248 F; and < 25 gal/yr evaporative losses.	5.9.2	✓
Pits and Ponds as defined in Rule 1020.	5.10.6	✓
Non-structural repairs & maintenance to permitted equipment.	4.2.6	✓
Emissions less than 2 lb/day from units not included above.	4.2.1	✓

ATTACHMENT C - CURRENT ATCs AND PTOs

ATTACHMENT D- EPA COMMENTS

The following EPA comments were received regarding the proposed Title V Operating Permit for both **Texaco (S-1129)** and **Nuevo Energy (S-1372)**. These comments apply to both facilities and are encapsulated below followed by the District's response. A copy of the EPA 5/6/02 comment letter is available at the District.

1. EPA COMMENT – Prevention of Significant Deterioration:

We recommend that the District work with EPA and Texaco to identify which units are subject to these and other PSD permit requirements on the list we provided the District and add them to the draft Title V permit. We also recommend that the District follow a similar process for the list of Unocal PSD permits (since S-1372 was formerly owned by Unocal).

DISTRICT RESPONSE

In regards to PSD, Unocal held NSR permits with the EPA not PSD as PSD was not triggered due to the separation of the Unocal properties noncontiguous nonadjacent EPA sources). These were permits on Unocal's oil fired steam generators that are still active but of course now fired on natural gas with LoNOx burners. In the 1980's when these oil fired units were relocated to other sources a PSD exemption letter was sent to Matt Haber of the US EPA.

2. EPA COMMENT – Boiler Steam Generators - SOx Emissions:

Many of these units burning well vent/TEOR gas (for instance, Texaco units 16 and 24) are small (23 or 25 mmbtu/hr), but have source specific emission limits well over the major source levels for SOx and far greater than allowed under the SIP. For instance, unit 26 is the smallest at 23 mmbtu/hr and is permitted to emit 214 tons per year of SOx based on an emission limit of 2.124 lb SOx/mmbtu (condition 12) that far exceeds the Kern County Rule 424 SIP sulfur compounds emission limit of 0.11 lbs sulfur/mmBTU (condition 11). While the SIP allows averaging in certain circumstances, the permits do not contain any alternate operating scenarios to implement emissions averaging, and the source could not reach compliance by averaging if the emissions are as high as allowed under the permits for the units burning well vent/TEOR gas. Therefore, we recommend revising conditions 12 through 14 to comply with the SIP limit for SOx emissions and reviewing any original PSD or ATC permits for additional requirements that apply to these units. We understand that the District is reviewing these permits to remove the averaging option for units that are not allowed to average, and we recommend including alternate operating scenarios for those units which Nuevo or Texaco would like to average.

DISTRICT RESPONSE

Units who have the option of averaging have been identified and will specifically be added to the Nuevo permits. The group of units under consideration are: S-1372-1, -2, -4, -5, -13, -16, -17, -18, -19, -20, -24, and -26 are permits. (Bremer: 1372, -17, -18, -19, and -20; Dome: 1372-16, -13, and -24; Cymric: 1372-1, -4 and -2; McKittrick C -26). The averaging option for the other boiler units is not necessary and will be removed.

3. EPA COMMENT – Boiler Steam Generators- Sulfur compound emissions:

In addition, we recommend changing the first sentence to read “sulfur compound emissions shall not exceed ...” based on the underlying regulation (for instance, see rule 4406 section 4.0).

DISTRICT RESPONSE

The District will revise the condition to read as follows:

“Sulfur compound emissions shall not exceed 0.11 lb of sulfur per million BTU of heat input, averaged over 3 - one hour periods. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas....”

4. EPA COMMENT – Boiler Steam Generators – Sulfur testing frequency:

If no SOx controls are required to meet these limits, we recommend revising the level of monitoring based on the major quantity of emissions that may occur. For instance, there is no specified source of vapor recovery gas, so emissions may vary significantly and vapor recovery gas will contain several orders of magnitude more sulfur than PUC regulated natural gas. We recommend sulfur testing of vapor recovery gas no less frequently than monthly, as listed in PSD permits SJ 78-16 and SJ 78-17 for the facility, or daily for high sulfur streams (see Neuvo Energy units 352 and 353).

DISTRICT RESPONSE

The PSD permit example given above is for Texaco (S-1129).

Permit units 1372-352 and –353 have been cancelled and will not be included in the facility’s Title V permit. For the other units, the testing frequency needed to comply with the SOx limits is initially set to eight consecutive weeks and quarterly monitoring thereafter (see S-12372-1-18, condition 30). We think the level of monitoring is sufficient to provide assurance that the SOx limits will be met. However, there are some units with semi-annual monitoring, and they will be adjusted to quarterly monitoring to be consistent with the other permits. Of course if an NSR action required more frequent monitoring, the more stringent monitoring frequency will be kept.

5. EPA COMMENT – Boiler Steam Generators - Testing and Averaging Times:

We agree with the requirement for portable analyzers to measure NOx and CO emissions, and recommend specifying calibration with Protocol 1 gas before each use. (For instance, condition 15 in several Texaco BSG permits).

DISTRICT RESPONSE

The Nuevo draft permits already specifies that the source must calibrate the portable analyzer with “certified calibration gases.” For Texaco facility this comment is more relevant and language was added to Texaco’s permits specifying that calibration occur with certified gases.

6. EPA COMMENT – Boiler Steam Generators:

We also agree with the requirement for source testing, and recommend an averaging time based on the length of the sampling runs. (For instance, Texaco BSG 16 condition 12) Also, “ASTM D3246 or double GC for H₂S and mercaptans is listed in the permit. The conditions should spell out “GC” and explain a reference for the Gas chromatograph method.

DISTRICT RESPONSE

The District will revise the boiler templates in the future to reflect this language change, but will keep the language as proposed in the Title V permits at this time.

7. EPA COMMENT –Fugitive Dust Rules

We agree with the inclusion of fugitive dust rules in the proposed Texaco permit. The proposed permit contains a gap between end of April, and May 15th (conditions 65-74) for fugitive dust rules. However, these rules state (for instance, see Rule 8030 section 2.0) that the current rules will not expire on April 30 unless the new rules are effective, and the permit states that the new rules are not effective until May 15th. Therefore, we recommend dropping the reference to the older rule and just stating that the current rule is required (since the permits will likely be issued after May 15th) or eliminating this gap. We also recommend including updated rules in the Neuvo permit as well.

DISTRICT RESPONSE

Rules 8021, 8031, 8051, 8061, and 8071 have recently been approved into the SIP as limited approval/disapproval. The applicable requirements for these rules have been incorporated into conditions 31 through 35 on the facility wide requirements (S-1372-0-1). They replace the general permit template conditions for Regulation VIII requirements (conditions 31, 32 and 33).

8. EPA COMMENT – Nuevo Energy H₂S scrubber requirements:

The permit for Neuvo Energy requires 95% reduction of H₂S from “7E vapor recovery gas” whether it is burned in the BSG unit 334 or flare unit 352. However, the permit only requires monitoring of the scrubber when the gases are burned in unit 352 (see conditions 7 through 9). Therefore, similar conditions (including daily H₂S monitoring) are necessary for unit 334 as well. (Please also note that some Nuevo Energy BSGs, such as unit 10, are only required to sample for sulfur once per year and need additional sampling, as noted earlier).

DISTRICT RESPONSE

Permit units S-1372-352 and -353 have been cancelled by the applicant. The sulfur emissions limit monitoring is being done on an initial eight consecutive week basis, after which they will go to quarterly monitoring (See comment #4).

9. EPA COMMENT – Nuevo Energy Permit Proposed Rule 4801 Permit Shield:

This proposed permit contains a proposed Rule 4801 Permit Shield for 106 well vent and tank permits (see p.84 of evaluation). The District must remove the proposed Rule 4801 permit shields, which is consistent with the proposed permit for Texaco,

because they can conflict with this applicable requirement. The proposed permits state that well vent casing gas emissions and tank emissions are fugitive and are not subject to this rule. We realize that some fugitive emission sources (individual leaking valves or seals, etc) would be impractical to source test to determine compliance. However, tanks typically do have point source emissions (see enclosed description from CARB manual) and well vents are also point sources. In addition, the rule applies to any discharge of sulfur compounds, not just sources such as combustion unit stack emissions. Therefore, the proposed shield conflicts with the applicable requirements.

(EPA has not reviewed the proposed tank permits, other than the Rule 4801 permit shield, as we understand that they are based on the obsolete version of the District's tank rule rather than the current version and will be updated when the current rule is incorporated into the permit.)

DISTRICT RESPONSE

The approved District tank templates concurs that Rule 4801 is not applicable and the permit shield is granted for tanks who use the template. For example SJV-TK-10-0 states:

A permit shield will also be granted for District Rule 4801. This rule specifies testing requirements for a stack source. Tank emissions are fugitive emissions not considered to come from a point source. Therefore, this rule does not apply to units covered by this template. A permit shield is granted from this requirement in template permit condition #29.

Therefore, the District will be consistent with the previous determination and keep the permit shield for the tanks.

In addition, one of the proposed Texaco well vent permits mentioned in the above comment does have the permit shield for Rule 4801. Therefore, the District will be consistent with the previous determination and keep the permit shield for the well vents.

10.EPA COMMENT – Nuevo Energy Proposed Kern County Rule 108.1 Permit Shield:

The proposed permit would contain a permit shield against Kern County SIP Rule 108.1 based on permit conditions that require any source testing to comply with San Joaquin Valley UAPCD Rule 1081. However, this condition does not contain the authority for the APCO to require testing, as provided in SIP Rule 108.1 (and District Rule 1081 section 4.0) and may lack other conditions as well. Therefore, we recommend adding the additional requirements to the permit to justify the permit shield. Also, as noted by District staff, it may be more efficient to include these requirements on the facility-wide permit conditions.

DISTRICT RESPONSE

Condition 21 on the facility wide permit has been changed to:

Upon the request an authorized representative of the District, a permittee shall collect, have collected, or allow the APCO to monitor or sample, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Title V Facility Contacts

Created On (Date):

02/29/00

For (Facility name):
(DBA ID Number):

Nuevo Energy Company Heavy Oil Western, CA
S-1372

By (District Staff Person):

Carlos V. Garcia

Based on Information Provided by:

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